

# **Sustainability Appraisal Post Hearing Update In response to IL07**

*Replaces Sections 5.1 and 5.2 of CD/G/4 Sustainability Appraisal Report of  
the Submission Draft Worthing Local Plan (Submission SA Report)*

## **Appendices**

E. DIIA Report

F. DIIA Technical Appendices

G. Additional Site Criteria

## **1. Introduction**

- 1.1 In-line with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present an appraisal of “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” whilst in-line with Schedule 2(8) there is a need to explain “the reasons for selecting the alternatives dealt with. Alternatives should be reasonable, realistic, deliverable and sufficiently distinct to enable meaningful comparisons to be drawn.
- 1.2 The update responds to the Inspector’s Initial Advice (IL07) that was received following the Local Plan examination hearings to help ensure that the SA that has informed the Local Plan is legally compliant and meets the requirements of the National Planning Policy Framework (NPPF). The Inspector’s Initial Advice confirms that the evidence base as a whole provided a clear, proportionate and robust basis for the preparation of the WLP, and overall, the justification for the plan is reasonably clear. It also sets the expectation that this update should not result in the need to prepare new evidence or alter any of the justifications that already exist in the evidence base.
- 1.3 This update to the SA Report addresses the concerns raised by the Local Plan Inspector that the SA ‘is not as clear as it might be in identifying why certain options were selected and others rejected’. It draws together existing evidence on the identification and selection of preferred options and explains how policies have evolved from the start of preparing the Local Plan up to the point of submission. It links back to the testing of options and policies within the SA that accompanied the Draft Local Plan (CD/F/8 Draft Integrated Impact Assessment (DIIA) 2018) (Appendix E) to fully explain how policies have evolved and been refined throughout preparation of the Local Plan and how this has been informed by the evidence and appraisal of significant effects. This document therefore seeks to provide that clearer story.
- 1.4 It should be noted that in undertaking this update no new evidence has been required. The information collated has been taken from existing evidence studies, the DIIA (CD/F/8), Submission SA Report (CD/G/4), Sustainability Appraisal Note - Appraisal of Unmet Need (WBC-E15) and Local Plan consultation documents. This update has been published as an addendum to the Submission SA Report ([CD/G/4](#)) and should therefore be read alongside the original report. It replaces sections 5.2 and 5.3 of the Submission SA Report, and includes appendices to bring the earlier Draft Integrated Impact Assessment that supported the Draft Worthing Local Plan and other earlier site appraisals into the SA Report.

## **2. Previous Local Plan Stages**

### **The Your Town - Your Future (May 2016)**

- 2.1 This was the initial Local Plan consultation viewed as the first step in preparing a new Plan. This consultation identified the issues and challenges facing the borough and the options that could help address them. Unlike many other local authority areas

which cover wide areas there are only a limited number of development options in and around the town. The consultation document did identify potential sites being considered but did not state which sites would be allocated for development.

- 2.2 This initial local plan consultation document was supported by the Landscape and Ecology Study (2015) and Worthing Housing Study (2015). It was accompanied by the SA Scoping Report (2015). An Employment Land Review was published in April 2016, however timing meant the recommendations of this had not informed this version of the Local Plan.

### **Regulation 18 Draft Local Plan (October 2018)**

- 2.3 The Regulation 18 Draft Plan, that set out the Council's preferred options was published for consultation between 31st October and 12th December 2018. The Draft Local Plan set out the proposed strategy and policies to guide future development to 2033. Part 1 of the document sets out the key challenges, vision and strategic objectives, part 2 the spatial strategy, part 3 sites and part 4 Development Management policies. Part 3 sites included a mixture of site allocations and areas of change. These are important previously developed sites within Worthing where change is expected and encouraged over the Plan period. However, there is currently insufficient delivery certainty for these sites that would justify a specific allocation.
- 2.4 Since the Issues and Option consultation a number of evidence studies had been produced and updated which informed the Draft Local Plan this included:
- Worthing Employment Land Review - April 2016
  - Landscape and Ecology Study Addendum - March 2017
  - Landscape and Ecology Study Review of Low Suitability Sites - March 2017
  - Landscape and Ecology Study Combined Summary - March 2017
  - Worthing Retail and Town Centre Uses Study - August 2017
  - Local Green Space Assessment - June 2018
  - Worthing Local Plan Transport Assessment - August 2018
- 2.5 The consultation document was also accompanied by a Sequential and Exception test, Sustainability Appraisal (Draft Integrated Impact Assessment) which included a Habitats Regulations Assessment Screening, Housing Implementation Strategy, Interim Duty to Cooperate Statement and Infrastructure Delivery Plan.

### **Regulation 19 Submission Draft Local Plan (January 2021)**

- 2.6 The Submission Draft Local Plan will, when adopted, provide a strategy for sustainable development and change in Worthing up to 2036. The Regulation 19 consultation on the Submission Draft Worthing Local Plan ran for 8 weeks between Tuesday 26th January and Tuesday 23rd March 2021. The Local Plan provides the broad policy framework and a long-term spatial strategy to manage development, respond to climate change, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities. The structure of this version of the Local Plan was amended to clearly distinguish strategic and non-strategic policies, it also amended the approach taken to sites with all sites included in this

version of the plan being allocations. Part 1 of the document sets out the introduction, part 2 vision and strategic objectives including strategic policies, part 3 the spatial strategy, part 4 site allocations and part 5 Development Management policies. A key change from the Draft Local Plan is that this version of the Local Plan did not include any areas of change.

- 2.7 Since the Draft Local Plan consultation a number of further evidence studies have been produced and updated which has helped inform this version of the Local Plan.
- Coastal West Sussex Authorities Gypsy and Traveller Accommodation Assessment (GTAA) (April 2019)
  - Joint Sport, Leisure and Open Space Study (2019)
  - Adur and Worthing - Strategic Housing Market Assessment (SHMA) (2020)
  - Worthing Employment Land Review Focused Update (2020)
  - Worthing Town Centre Retail Study Update (2020)
  - Adur & Worthing Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) (2020)
  - Worthing Local Plan - Transport Assessment - Addendum (2021)
- 2.8 The consultation document was accompanied by a number of supporting documents including a mapping extracts document, Duty to Cooperate Statement, Sustainability Appraisal (SA Report), Infrastructure Delivery Plan, Flood risk sequential and exception test, topic paper 1 - draft housing implementation strategy, topic paper 2 - land outside of the Built Up Area Boundary and topic paper 3 - monitoring framework. The Whole Plan Viability Assessment (2021) and Local Plan Route Mapper (2021) were also published alongside this consultation.

### **3. Appraisal of Reasonable Alternatives**

- 3.1 This section follows the same structure as the Submission Draft Local Plan and tells the story of how the Local Plan strategy and policies have developed. It aims to ensure that along with the rest of the Submission SA Report the reasons for selecting or rejecting alternatives are clear.
- 3.2 The consideration of the total effects of the Local Plan are set out in Section 5.3 of the SA Report.

#### **Strategic Policies**

- 3.3 This section of the Local Plan sets out the Vision, Strategic Objectives and Strategic Policies.
- 3.4 Stage B1 of the SA process requires the Strategic Objectives of the Local Plan to be tested against the sustainability framework. This helps to identify where objectives are compatible and where conflicts may arise.
- 3.5 The 2016 Issues and Options consultation of the Local plan contained an initial list of Strategic Objectives. A recurrent theme in a number of consultation responses was the hope that Worthing could become a 'leader' in sustainable development with a



strong environmental focus. As a result changes were made when preparing the Draft Local Plan version to strengthen this aspect of the Plan.

- 3.6 The Strategic Objectives contained in the Draft Local Plan were tested as part of DIIA (Section 4.3, Appendix E). This concluded that many of the objectives of the Draft Worthing Local Plan and the SA framework are compatible, which means they strengthen and support each other. Conflicts were identified between the Housing and Employment Strategic Objectives and the environmental SA Objectives and vice versa. Equally there were conflicts between Housing and Economy objectives reflecting the competing demands for land in such a constrained Local Authority.
- 3.7 Since the Regulation 18 Draft Worthing Local Plan 2018 consultation an additional strategic objective has been added to reflect the Council's declaration of a Climate Emergency:

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

- 3.8 The full appraisal has been updated to include SO21 and can be found in Appendix C of the Submission SA Report. The assessment identified that many of the objectives of the Worthing Local Plan and the SA framework are compatible, which means they strengthen and support each other. However, some potential conflicts were identified and mitigation identified. Conflicts between competing concerns and land uses such as new development and the protection of the environment are always likely to arise. Mitigation and how it has influenced the Local Plan is included in Part 6 of this report.

### **SP1 - Presumption in favour of sustainable development**

- 3.9 The inclusion of this policy helps to integrate the NPPF at the local level. This policy has not been subject to this appraisal as it is a model policy recommended for inclusion by PINS and therefore any SA findings would do little by way of influencing the policy.
- 3.10 Within the Draft Local Plan this policy was included within Part 3. This has now been moved to a 'new' chapter 2 alongside 2 new strategic policies. The structure and order of policies within the Local Plan is not considered relevant to the SA.
- 3.11 No significant change was made to the wording of this policy between the Draft and Submission versions of the Plan.

### **SP2 - Climate change**

- 3.12 This is a new policy included within the Submission Draft version of the Local Plan

which responds to the NPPF requirement for Local Plans to identify strategic policies, the Councils declaration of a Climate Emergency and the new Strategic Objective SO21. The need to ensure the policy reflected this local priority and that it was also consistent with national policy, meant no reasonable alternatives were identified.

- 3.13 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative and maximise positive effects by in this or the more detailed climate change policies recognising the potential conflict with preservation of the historic environment, particularly in relation to Listed Buildings. Furthermore the wider benefits of climate change adaptation to communities including the ways in which it can help reduce inequalities and promote social benefits should be promoted. The results of its appraisal are copied below:

<b>SP2 Climate Change</b>								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	+	0	++	++	0	+	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	+	?	0	?	0	+

- 3.14 The appraisal shows that the policy scores positively with very positive effects against the energy and water management objectives.

### **SP3 - Healthy communities**

- 3.15 This was in the Draft Local Plan under Policy CP7 Healthy Communities. In forming this policy no reasonable alternatives were identified due to the requirement for the policy to be consistent with national policy. This policy was appraised as part of the total effects of the Draft Local Plan in technical appendices D3 of the DIIA. A copy is included in Appendix F of this Report. The results of its appraisal are copied below:

<b>CP7 - Healthy Communities</b>								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	/	0	0	/	/	0	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	++	/	+	+	0	+	0	+

- 3.16 As a result of this appraisal, mitigation was identified to maximise positive effects by making specific reference to reducing pollution. This has been incorporated in point v. of Policy SP3 which recognises the links between poor health and poor air quality and noise.

- 3.17 It was recognised that health and wellbeing has many cross cutting themes with a number of policy areas in the plan i.e. green infrastructure, active travel, open space etc so it was considered that it would be a better fit if it became a high level strategic policy. Therefore for the Submission Draft Local Plan version, this policy was moved to this section of the Plan to distinguish it as a strategic policy in line with the NPPF.
- 3.18 Although some changes were made to the wording of the policy, the Submission Draft version of this policy continued to deliver healthy places, promote healthy lifestyles, support new and improved health facilities and services. Therefore these versions of the policy were not sufficiently distinct to enable meaningful comparisons to be drawn and therefore they were not tested in the SA as reasonable alternatives.
- 3.19 The Submission Draft version of the policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to maximise positive effects by including reference to fuel poverty and more generally the need to address inequalities and climate justice. The results of its appraisal are copied below:

SP3 Healthy Communities								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	+	0	?	+	0	?	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	++	+	+	++	0	+	0	++

- 3.20 As can be seen the revised policy scores more positively against objectives 1 Environmental Quality, 5 Water Management, 10 Crime and Public Safety, 12 Communities and 16 Travel. This is mostly as a result of the mitigation previously identified being incorporated.

## **Spatial Strategy**

### **SS1 - Spatial strategy**

- 3.21 The Spatial Strategy has emerged through consideration of evidence recommendations and options identified in the plan preparation process. The limited options available mean it has progressed largely unchanged.
- 3.22 The option of building out to sea was identified and considered early on in the preparation of the Worthing Core Strategy which concluded that the only scenario that would provide sufficient financial return to make the project viable would require intensive development that would have little or no relation to the existing urban character or form. It was estimated that such a scheme would have a major impact on local infrastructure. There has since been no further evidence or proposals to

suggest that this would now be viable and for this reason this option was scoped out of the SA at an early stage.

- 3.23 In line with Government requirements the starting point in this process was to encourage the effective use of land by reusing sites that have been previously developed (brownfield land) through raising densities. The 2016 Issues and Options consultation document made clear that even prior to assessing sites, given the lack of available land within the Borough and significant environmental constraints, it is highly unlikely that the full OAN could be met. It was recognised that brownfield sites alone (even at higher densities) would not be sufficient and that all greenfield opportunities would also need to be considered. However even with greenfield sites the 2016 consultation document recognised and acknowledged that given the lack of available land around the borough, it would not be possible to provide the full local housing need and there was likely to be a significant shortfall. The Issues & Options consultation received representations from 261 respondents during the consultation period. A significant number of respondents (210+) argued strongly that all greenfield sites should be protected from development.

The option of continuing to rely solely on brownfield sites versus also considering greenfield opportunities was appraised as part of the options appraisal within the DIIA (Appendix F).

It concluded that Option 1 (brownfield only) scores as having positive effects across a number of environmental objectives. However, this needs to be balanced against negative scores for housing, economy, town and local centres and water management reflecting how this option will reduce the number of potential sites for development. There are also a number of neutral effects concerning communities and education.

Option 2 (brownfield and sustainable urban extensions) scores positively across the majority of social and economic objectives. A number of negative environmental effects have been identified associated with development of greenfield sites.

The appraisal concluded that the preferred approach for the Local Plan was Option 2 which overall scores more positively due to the larger number of potential sites and the opportunities this brings to meet the widest range of needs by enabling a greater mix of uses to be accommodated across a variety of sites. However it recommended that environmental evidence is considered when selecting appropriate sites for development.

- 3.24 This option was used to form Policy SP2 in the Draft Local Plan. It set out the spatial strategy of making efficient use of previously developed land within the Built Up Area Boundary, allocating edge of town sites suitable for development, and protecting valued open space and landscapes outside of the Built Up Area Boundary.
- 3.25 This policy was appraised as part of the total effects of the Draft Local Plan in the DIIA (Appendix F). Mitigation was identified that more explicit reference could be made to promoting new employment uses. The results of its appraisal are copied below:

SP2 Spatial Strategy								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	-	/	+	-	-	+	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	+	+	/	/	+	?

3.26 In reviewing the representations received to the Draft Local Plan, officers acknowledged that given the lack of alternative options, the Spatial Strategy will remain largely unchanged. There were some minor wording changes between the Draft Local Plan and Submission Draft Local Plan versions of this policy such as reference added to 'natural resources' and 'features that provide connectivity' but it was not considered that these caused the policy to become sufficiently distinct from the previous version to enable meaningful comparisons to be drawn. Therefore these changes were not tested in the SA as reasonable alternatives.

3.27 This policy became Policy SS1 in the Submission Draft Plan and was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. It was noted that most potential negative effects could be mitigated through other policies in the Plan. The results of its appraisal are copied below:

SS1 - Spatial Strategy								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	-	/	+	-	-	+	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	+	+	/	+	+	?

3.28 As can be seen the Appraisal of these policies was largely unchanged with the only exception being Objective 14 economy which changed from neutral to positive reflecting the allocation of sites which were previously areas of change. This has increased the number of key regeneration sites included as allocations which will more strongly support delivery of wider regeneration objectives which will benefit the local economy.

## SS2 - Development sites

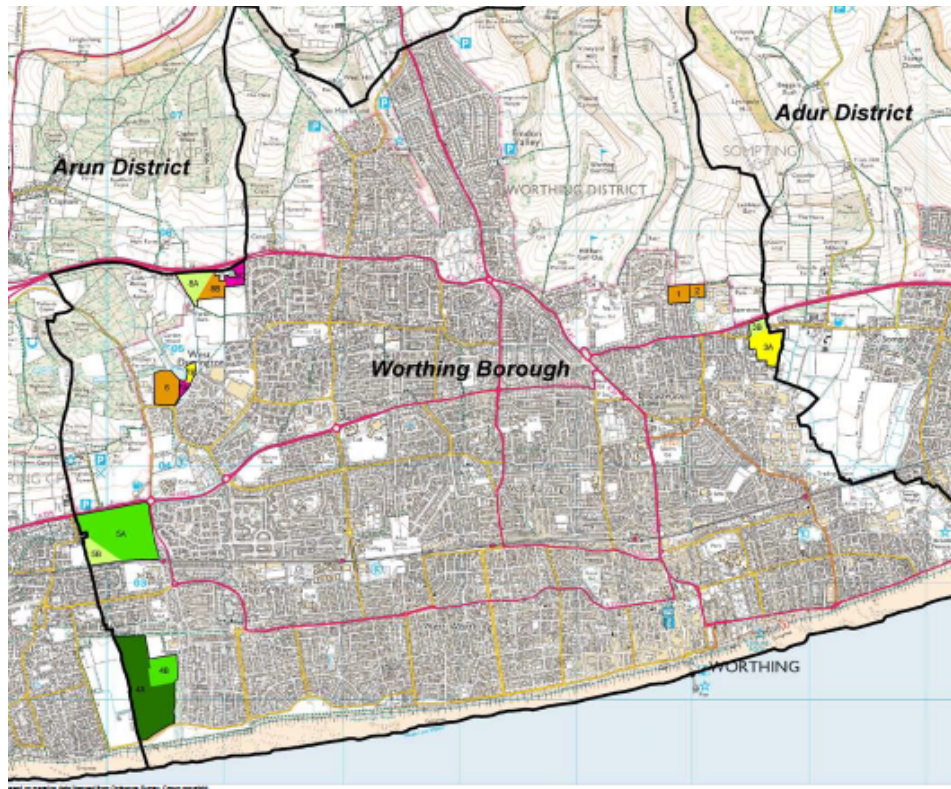
### Housing

3.29 The 2015 Housing Study concluded that the full Objectively Assessed Need (OAN) for housing in the Borough (2013-2033) was 636 dwellings per annum, significantly higher than the target in the existing Core Strategy. The Issues and Options consultation document made clear that it will be the role of the Local Plan review to

assess what level of growth can be reasonably and sustainably delivered to seek to meet the full OAN, and in doing so all greenfield sites would need to be positively considered for development.

3.30 The Landscape and Ecology Study (2015) assessed the suitability of development of the potential greenfield sites in terms of landscape, visual impact and ecology. This concluded that out of the 8 sites (14 parcels) considered:

- Sites 3B, 4A, 4B, 5A, 5B and 8A have negligible to low suitability for development. Development in these areas would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between settlements, the setting to existing settlement or the South Downs National Park.
- Sites 3A and 7B have Medium suitability for housing development. These sites are potentially suitable for limited development proposals which would 'round off' a settlement or develop infill sites, but would need to demonstrate no adverse impacts on the setting to the National Park or the wider landscape, and should have regard for the setting and form of existing settlement and the character and sensitivity of the adjacent landscapes.
- Sites 1, 2, 6 and 8B have Medium/High suitability for development. These sites could accommodate urban extensions and/or infill sites, due to their generally lower sensitivity or value, provided sensitive considerations are taken into account, in particular the setting to the South Downs National Park.
- Sites 7A and 8C are less constrained areas with high suitability for development which could accommodate allocations of new development without significant detrimental effects on the character of the landscape as a whole provided the form of new development proposals are closely related to, and in scale with, existing adjacent settlement.



*Extract from Worthing Landscape and Ecology Study 2015 Figure 26 Suitability for Development*

3.31 Based on this the SA identified 3 broad options to meeting OAN as far as possible. This was appraised as part of the options appraisal within the DIIA (Appendix F).

Option 1: Residential development on all potential sites allowing no land for other uses at sufficient densities to seek to meet full OAN. This would potentially result in 11,295 homes.  
 Option 2: Residential development on all potential sites allowing a mix of uses, landscaping and mitigation where suitable and or required. This would potentially result in 2,023 homes.  
 Option 3: Residential development on all sites recommended as suitable for development by the evidence (i.e excluding those parcels of land the landscape and ecology study concluded had negligible or low suitability for development). This would potentially result in 853 homes.

The appraisal 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 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 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.

The preferred option for the Local Plan was Option 3 as it was considered that the significant negative impacts associated with Options 1 and 2 would significantly and demonstrably outweigh the benefits. It was therefore considered that Option 3 represented the most balanced approach to meeting competing demands. However it was recognised that further appraisals and consideration of individual sites would be needed.

- 3.32 Policy SP3 in the Draft Local Plan therefore set a housing target of a minimum of 4,182 dwellings (net) during the period 2016 - 2033 which was in line with the approach set out in Option 3 of the SA, with site allocations delivering 853 homes.

### Employment and Commercial Floorspace

- 3.33 Policy SP3 also included an indicative minimum of 50,000 square metres of employment floorspace and 11,957 square metres of commercial floorspace. The Employment Land Review (2016) identified a demand for small scale, high quality office space in accessible locations, and a severe shortage of, and strong local demand for industrial units. The study assessed four different scenarios of future employment space requirements in Worthing over the period to 2033 concluding a minimum requirement of 54,690sq.m of employment (B class) floorspace to 2033. The majority of this identified need relates to industrial uses. The Council's Retail Study 2017 estimates a need to provide 9,200 sqm of comparison floorspace (non-food) and 1,250 sqm of convenience retail (food) (to 2026).

- 3.34 Given the significant shortfall likely in meeting local housing need it was recognised that to comply with the NPPF it would be important to maximise housing delivery as much as possible whilst still delivering sustainable development. With this in mind no other reasonable options were identified for setting the employment and commercial floorspace targets. This policy was appraised as part of the total effects of the Draft Local Plan in the DIIA (Appendix F). The results of its appraisal are copied below:

SP3 - Development Sites								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	-	-	?	-	-	?	0	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	+	+	?	?	+	+	?



## Housing

- 3.35 In response to the Draft Local Plan consultation representations officers highlighted that WBC will continue to work with authorities within the sub-region to assess how housing needs can be met. In particular, work will focus on the progression of LSS3.
- 3.36 In 2018 the Government introduced the Standard Method for assessing housing need which was further updated in 2020. The Council's Strategic Housing Market Assessment (SHMA) (2020) used the Government's standard method for assessing housing need, this resulted in a minimum local housing need for 880 dwellings per annum in Worthing. This was significantly higher than the previously identified OAN in 2015, however the constrained supply of land means this is no more likely to be met than the previous figure and therefore no additional reasonable alternatives to meet this need were identified.
- 3.37 The Draft Worthing Local Plan (DWLP) indicated a total supply of dwellings as being 4,182 over a plan period of 2016 - 2033. This included dwellings from all sources including proposed site allocations within the plan to deliver 853 dwellings. The site allocations were considered to be 'deliverable'. In addition, the DWLP also included Areas of Change (AOC) where change was expected and encouraged over the Plan period. These sites had a capacity to deliver 495 dwellings (included under the 'Other Shlaa sites' supply figure in the DWLP) over the plan period. It was expected that some of these sites identified as AOC might become allocations by the time the Local Plan was submitted for examination ( a potential combined total of 1,348 dwellings). There were also a number of Omission sites where, in principle, a level of development might be acceptable, however, at the DWLP stage, sufficient and robust evidence had not been submitted that would provide confidence that the identified constraints could be overcome.
- 3.38 The Submission Draft Local Plan covers a period between 2020 to 2036 and indicates a total supply over the plan period of 3,672 dwellings. Out of this figure, 1,753 dwellings are from allocated sites. The difference between the proposed allocations figure in the Draft Plan to Submission Draft Plan results from the inclusion of AOC sites becoming allocated sites, the inclusion of two of the 'Omission' sites and increased capacity of individual sites. In addition, the base date of the Plan has been moved from 2016 to 2020 and the end date from 2033 to 2036. The remaining supply is derived from commitments (as at 1/4/2019), an updated windfall allowance figure and 'other shlaa sites' figure. Whilst the site allocations source of supply increased between the plan stages the other sources of supply had changed between 2016 to 2020 resulting in an overall supply figure lower than that at Draft Local Plan Stage. It is important to note that although the total supply figure changed, the policy continued to follow the same strategy approach to setting the housing requirement as Option 3 that was originally tested in the DIIA (i.e. to allocate sites that were recommended as suitable for development by the evidence). No reasonable alternative options to this strategy were identified. However, as with the Draft Plan policy, this policy option in terms of the housing supply figure it set was assessed on its own merits through the SA.

### **Employment and Commercial Floorspace**

- 3.39 Following the Draft Local Plan consultation a focused update (2020) was undertaken to the Employment Land Review. The purpose of this focused update was primarily to review the emerging policy approach in light of changes to national planning policy. In terms of employment land/floorspace needs, the Employment Land Review Focussed Update (2020) [CG/J/2] considered four scenarios, with results ranging from a current oversupply of 49,540 sqm of floorspace (-11.3 ha) to a need for 61,560 sqm of floorspace (14.7 ha). The Study recommended that the Council should plan to accommodate as a minimum the employment space requirements associated with the labour demand scenario (Scenario 1), equivalent to 32,560 sqm or 6.8 ha over the Local Plan period. This is a reduction from the 54,690 sqm the previous study recommended but based on the same scenario.
- 3.40 The delivery of sites not suitable for housing (along with the protection of other employment sites) provides close to the level of land needed to meet the labour demand scenario. Given the constrained land supply in Worthing, the only means to deliver above this level to meet the labour supply scenario would result in sites being allocated for employment space at the expense of housing, further increasing the significant levels of unmet housing needs. The Council considered that this would also be contrary to the NPPF requirement to meet local housing needs and was therefore not a reasonable or realistic option. As such, it is considered that the approach taken in the Submission Draft Worthing Local Plan to setting the employment floorspace target was, given the limited land available, the only option available which provides an appropriate and sensible balance between housing and employment growth in line with NPPF requirements. Policy SS2 of the Submission Draft Local Plan set a requirement of a minimum of 28,000 sqm of employment floorspace.
- 3.41 In relation to Commercial floorspace, the Worthing Town Centre Retail Study Update (2020) concluded that the Local Plan should consider the provision of a sufficient supply of suitable sites within the Primary Shopping Area and Areas of Change to accommodate an upper threshold of 9,000 sq.m net of comparison goods floorspace over the period to 2026. This policy approach was in accordance with National Policy, justified by robust evidence and already reflected in the level of floorspace allocated in the Draft Plan. Therefore when considered alongside the need to maximise housing delivery, no reasonable alternatives were identified. The Submission Draft Local Plan version of this Policy (SS2) set a requirement of 10,000 sqm of commercial floorspace. This was a slight reduction from the Draft Plan, the reasons for this were due to the progression and capacity assessments for individual sites. This detail is set out in the sections below for each relevant site.
- 3.42 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to maximise positive effects by indicating that the levels of development set out in this policy are a minimum and that other policies in the Plan seek to maximise housing delivery as far as appropriate. The results of its appraisal are copied below:

SS2 - Site Allocations								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	-	-	+	-	-	?	0	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	?	+	?	?	+	+	?

- 3.43 As can be seen the appraisals of the Draft and Submission Draft versions of this policy are very similar, however there are some differences as a result of the different levels of development that each version of the policy sets. The main differences being that the scores for Objective 3 (Land and Soils) has changed from uncertain to positive reflecting the increased certainty resulting from the change from areas of change to allocation for many of the brownfield sites. Equally Objective 10 (Crime and Public Safety) has changed from a positive to uncertain effect recognising the difficulty in linking levels of development with crime and perception of safety.

### SS3 - Town centre

- 3.44 Following the Draft Local Plan consultation it was acknowledged that the policy position established in CP14 Retail needed to be updated to reflect wider aspirations for the town centre. Furthermore, in response to changes in national market trends and national planning policy, the Council commissioned consultants to prepare an update to the 2017 Study focusing specifically on Worthing Town Centre. The 2020 Update concluded that the trend towards multi-dimensional town centres should not over-ride the importance and retention of retail uses (formerly Use Class A1) in Worthing Town Centre which should remain a priority. However, although there is still an identified need for comparison goods floorspace, rather than providing additional new floorspace this should instead be accommodated within an improved trading performance of existing floorspace.
- 3.45 Therefore a new strategic policy SS3 was added to the Submission Draft Local Plan. This policy forms part of the overall approach to development within the Town Centre and aims to reflect, and is in line with wider corporate and partner aspirations. As such no reasonable alternatives were identified.
- 3.46 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to further maximise positive effects by incorporating wording to enhance/improve linkages between the town centre and seafront, and support high quality public spaces. The results of its appraisal are copied below:

SS3 - Town Centre								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.

Score	0	0	+	0	0	+	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	?	+	+	+	0	++	++	+

#### SS4 - Countryside and undeveloped coast

3.47 This was included in the Draft Local Plan as Policy SP4. The aim of the policy is to designate land outside of the Built Up Area Boundary as countryside and undeveloped coast to protect landscape and coastal character including its environmental and recreational value. This approach to land outside of the Built Up Area Boundary continued the existing policy approach in the Core Strategy and is consistent with national policy, for this reason no reasonable alternatives were identified in the DIIA . However the overall impact of this policy was assessed.

3.48 This policy was appraised as part of the total effects of the Draft Local Plan in the DIIA (Appendix F). The results of its appraisal are copied below:

SP4 Countryside and Undeveloped Coast								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	+	+	0	0	+	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	-	0	0	-	0	+

3.49 In response to the Draft Plan consultation representations, it was noted that consideration should be given to all pockets of land located outside the proposed built up area boundary to ensure that their future use and designation is clarified. However this does not affect the policy wording or intention.

3.50 This policy was renamed Policy SS4 in the Submission Draft Local Plan but its content remains largely unchanged from Policy SP4 in the Draft Local Plan. References were added or strengthened relating to natural resources and biodiversity but these did not make the policy sufficiently distinct from the earlier version and so were not identified as reasonable alternatives.

3.51 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to further maximise positive effects by including policy wording to improve and enhance green infrastructure and enhanced access for all. The results of its appraisal are copied below:

SS4 - Countryside & Undeveloped Coast								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.

Score	/	+	+	0	0	+	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	--	0	0	-	0	+

- 3.52 As expected given the limited changes made to the policy the appraisal at this stage was very similar to that at the Draft Local Plan stage. The two differences were that the score for Objective 1 (Environmental Quality) changed from no to neutral effects recognising this policy would protect the countryside but is unlikely to have much effect from the baseline and the score for Objective 11 (housing) changed from negative to very negative effects further recognising that the restrictive nature of this policy would further limit the ability to meet local housing needs.

### SS5 - Local green gaps

- 3.53 Following the 2015 Landscape and Ecology Study, a further review was undertaken of those sites the 2015 study concluded had a low suitability for development (Upper Brighton Road, Chatsmore Farm, Land north of West Durrington), to again positively consider whether any development could be suitably located on parts of these sites. The high shortfall in meeting local housing need meant that only where sites were unsuitable for housing, were alternative uses considered.
- 3.54 The Worthing Landscape and Ecology Study Combined Summary (2017) concluded only the following sites had a low or negligible suitability for development:
- site 10 (Land at Dale Road - part of Brooklands) having low/medium suitability
  - site 8A (Land north of West Durrington) having low suitability
  - sites 4B (Goring Ferring Gap) and 5A (Chatsmore Farm) having negligible/low suitability site 4A (Goring Ferring Gap) having negligible suitability for development.
- 3.55 Furthermore the landscape evidence collated indicated that the following sites were suitable as being designated as Local Green Gap:
- Goring Ferring Gap
  - Chatsmore Farm
  - Brooklands Recreation Area
  - Land east of proposed development at Upper Brighton Road
- 3.56 As a result the option of designating each of these sites as Local Green Gap was identified and appraised as part of the options appraisal within the DIIA (Appendix F).

#### Option 1: Chatsmore Farm

Option 1 has very positive effects on landscape & character and built environment objectives through its primary purpose of maintaining separation between settlements and preventing coalescence. There are also other positive effects including on healthy lifestyles and economy through the indirect impacts of preserving the land in its current undeveloped state. It should be noted that there are very negative impacts associated with

resisting development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated.

#### Option 2: Goring Ferring Gap

Option 2 has very positive effects when scored against landscape and character and historic environment reflecting the benefits of maintaining separation between settlements. There are also multiple other positive impacts including on healthy lifestyles and communities. It should be noted that there are very negative impacts associated with resisting development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated. In relation to HIA/EqIA this option has very positive effects when scored against healthy lifestyles and communities reflecting the benefits of maintaining separation between settlements.

#### Option 3: Brooklands Recreation Area and abutting allotments

Option 3 has very positive effects associated with landscape & character and the built environment objectives due the primary purpose of the Local Gap maintaining separation between settlements. There are also positive effects for communities and healthy lifestyles reflecting the benefits of maintaining separation between settlements. Negative effects are identified against the housing and economy objectives due to the potential loss of land for development however given that most of this site is currently in use as a park, the area that would be available is limited to the north western corner. Other objectives are rated as neutral recognising the indirect benefits in terms of protecting this area of existing open space.

#### Option 4: Land east of proposed development (site A3) at Upper Brighton Road

The scoring of Option 4 reflects the compact nature of this site and that it will ultimately form part of the wider gap alongside designations to the east in Adur. This option has multiple positive benefits including for communities reflecting its contribution to protecting the Gap as a whole and preventing coalescence. It scores negative due to the lack of housing that potentially could have been delivered here in addition to the allocation on the remainder of the site. There is a neutral impact for healthy lifestyles as designating this part of the site as Local Gap will have no direct impact given the small size of the site.

The appraisal found all these options have an overall positive or neutral impact however it is recognised that Chatsmore Farm and Goring Ferring Gap score stronger due to the additional positive effects identified relating to the historic environment.

- 3.57 All these sites were subsequently included within Policy SP5 in the Draft Local Plan. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

SP5 Local Gaps								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	+	+	0	0	++	0	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.

Score	+	0	--	+	0	-	0	0
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- 3.58 In response to the representations received to the Draft Plan consultation, the Council stated that the significant levels of unmet housing need does not automatically override the need to protect sensitive environments.
- 3.59 This policy was renamed Policy SS5 in the Submission Draft Local Plan and was kept largely unchanged apart from minor amendments with regards to reference to natural capital and green infrastructure. As such no reasonable alternatives were identified.
- 3.60 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to maximise positive effects on biodiversity by including reference to enhancing Green Infrastructure networks which could also provide positive benefits against the communities, health and travel objectives.

The results of its appraisal are copied below:

SS5 - Local Green Gaps								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	/	+	+	0	0	++	0	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	--	0	0	-	0	+

- 3.61 Compared to the Draft Plan version of this policy, the appraisal at the Submission Draft stage shows more positive scores against Objective 1 Environmental Quality (changed from no to neutral effect) and Objective 16 Travel & Access (changed from no to positive effect). In contrast the scoring against Objective 12 Communities changed from a positive to no effect.

### **SS6 - Local green spaces**

- 3.62 Goring Ferring Gap and Chatsmore Farm were both proposed for designation as Local Green Space by the local community. The Local Green Space Assessment 2018 assessed their potential for designation along with Brooklands Recreation Area and were found to fully meet the NPPF criteria.
- 3.63 The conclusions of this study meant that once the landscape study had determined these sites were not suitable for development, the option of designating each of these sites as Local Green Space was identified and appraised as a reasonable option within the DIIA (Appendix F). This was considered in addition to other designations such as Local Green Gap.

#### Option 1: Goring Ferring Gap

Option 1 has very positive effects in terms of biodiversity, historic environment, landscape & character, healthy lifestyles and communities reflecting the reasons the site is valued. This is balanced against a very negative effect for housing and a negative effect for economy objectives reflecting the level of protection given by the designation which will restrict most development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.

#### Option 2: Chatsmore Farm

Option 2 scores less positively than the other two but still has very positive effects against landscape & character and communities objectives and a positive effect against healthy lifestyles reflecting the aspects the community values. This is balanced against a very negative effect for housing and a negative effect for economy objectives reflecting the level of protection given by the designation which will restrict most development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.

#### Option 3: Brooklands Recreation Area

Option 3 has very positive effects in terms of biodiversity, healthy lifestyles and communities; it also has a positive effect against the landscape & character objective reflecting the reasons the site is valued by the local community. This is balanced against negative effects for housing and economy objectives reflecting the level of protection given by the designation which will restrict most development but acknowledging that as most of the site is in use as formal recreation it is unlikely to become available for development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.

All these sites score positively overall and should be designated as Local Green Space in the Local Plan as recommended by evidence

3.64 As a result these sites were designated as Local Green Space in Policy SP6 of the Draft Local Plan. In response to the consultation representations received, the Council acknowledged the significant levels of unmet housing need but explained that this does not override the need to protect sensitive environments. The draft Plan explained the balance that had been struck and how this was supported by robust evidence.

3.65 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

SP6 Local Green Space								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	+	0	0	+	+	0	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	--	++	0	-	0	0



- 3.66 This Policy was renamed SS5 in the Submission Draft Local Plan but otherwise remained largely unchanged and no further reasonable alternatives were identified. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to further maximise positive effects against Objective 2 - Biodiversity, by encouraging these sites to be managed for biodiversity.

The results of its appraisal are copied below:

SS5 - Local Green Spaces								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	/	+	0	0	+	+	0	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	--	++	0	-	0	+

- 3.67 As expected given the minor nature of the changes made to the policy the appraisal results are unchanged apart from the scoring of Objective 1 Environmental Quality which has changed from no effect to neutral effect and Objective 16 which has changed from no effect to having a positive effect recognising that the valued green spaces this policy protects also provide green walking and cycling routes.

### Site Allocations

- 3.68 The Council's SHLAA and a continual call for sites was used to identify potential sites. This meant that there were some sites identified at different stages of the Local Plan process. Regardless of when a site was identified they were all initially appraised through the SA site criteria.
- 3.69 The SA site criteria was intended to provide an equal and where possible quantitative review of the constraints and opportunities associated with each site. It was not used to determine the suitability of sites and no sites were excluded on the basis of this. Rather it provided a useful starting point to ensure each site was appraised against the framework in a consistent way. The results of this can be found in Appendix F or Appendix G where a site was not included in the DIIA. A summary is given below for each site.
- 3.70 The Landscape and Ecology Study (2015) assessed the suitability of development of the potential greenfield sites in terms of landscape, visual impact and ecology. This considered and assessed 8 sites (14 parcels) the findings of this study are referred to in the sections for each site below.
- 3.71 Further landscape and ecology work was produced building on the 2015 study. This included the consideration of additional greenfield sites (Land East of Titnore Lane and Land at Dale Road) promoted through the Issues and Option Consultation as

well as a further review of those sites the 2015 study concluded had a low suitability of development to again consider whether any development could be suitably located on part of these sites.

3.72 The requirement to meet the housing need figure, combined with a lack of available land meant there are no reasonable alternatives except to meet the local needs as far as possible. Given the high local need for housing and lack of available land all potential sites have been assessed positively and as a result all sites where the evidence suggests development is suitable or the potential effects can be sufficiently mitigated have been allocated.

3.73 Additional sites were put forward as part of the Draft Local Plan consultation. These were:

- WB19004 - 19-23 South Street (Beales includes 35-39 South Street included)  
SHLAA Conclusion: *This site located within the primary shopping area of Worthing town centre. A planning application has been submitted (AWDM/1529/18) to retain retail uses but also to provide for 45 new residential units through change of use of some floorspace and through extensions. The proposal has since been approved (17/1/2019). Therefore, the site will not be taken forward in this study but any residential units delivered will be monitored elsewhere.* Therefore this site was not considered as a potential site for the Local Plan as it fell below the threshold and is under construction.
- Montague Shopping Centre  
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.
- WB15011 - WSCC site - Land east of 2 Offington Avenue  
SHLAA conclusion: *The site had first been assessed in 2015 and at that time it was considered to be too small for the threshold of the study. Since that time the agent for the owners of the land have submitted a response to the 'call for sites' and suggested that a development of 5-10 flats could be achieved on this site. Discussions with officers have highlighted that the site is within an Air Quality Management Area and as such would potentially place new residents at risk of high exposure to local air pollutants. The site so close to this extremely busy junction with long periods of traffic idling. In addition, delivering development above the threshold of this study would result in a flattened development of 5+ dwellings which is considered unacceptable in this location. In the absence of any robust evidence to the contrary the site should be rejected for the purposes of this study.* Therefore this site was not considered as a potential site for the Local Plan as it fell below the threshold.

- 3.74 The findings of the Adur & Worthing Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) (2020) was used to update the Submission Draft version of the site allocation policies. This study was also used to inform the Flood Risk Sequential and Exception Test.
- 3.75 In terms of the sequential test it was concluded that whilst the majority of sites are located in Flood Zone 1 and these are the most sequentially preferable. However due to the limited land availability and resulting significant shortfall in meeting local housing needs, all suitably available sites are required. The process undertaken considered all sources of flooding and demonstrated there were no other reasonably available sites appropriate for development in areas with a lower risk of flooding. Therefore it is considered that all the allocated sites pass the sequential test, as required by the NPPF. Where required by the NPPF those sites at a medium or high risk of flooding have been subject to the exception test, informed by a Level 2 SFRA and the findings from the SA.

### **Aquarena**

#### **SA Site Criteria Summary**

Opportunities: • It is a vacant brownfield site providing an opportunity for regeneration. • The site is within 800m of Ham Road local centre and the Town Centre Boundary. • Located within the Built Up Area Boundary.

Constraints: • The whole site is located in Flood Zone 3. • Potentially contaminated land. • Potentially contaminated land.

- 3.76 This site was included in the 2016 Issues and Options consultation document as a potential Area of Change. The consultation document described the site as an opportunity 'To deliver a mixed use development on the land occupied by the former swimming pool to help regenerate the area'.
- 3.77 Following the Issues and Options Consultation, the Aquarena site was granted planning permission (AWDM/1633/16) for 141 apartments at Worthing Planning Committee on 19 January 2017. The planning decision was issued 10 March 2017 and construction is now underway. Therefore this site was not taken forward in the Draft Worthing Local Plan.

### **Land north of West Durrington**

#### **SA Site Criteria Summary**

Opportunities: • The site is in Flood Zone 1. • Located within the Built Up Area Boundary • within 800m of West Durrington District Centre

Constraints: • Within Source Protection Zone 1. • The site is adjacent to the South Downs National Park to the north and west and is considered to form part of the undeveloped southern setting • The site is located to the east of the Castle Goring Conservation Area relatively close to a number of Listed Buildings.

- 3.78 The site was assessed through the 2015 Landscape and Ecology Study which concluded that in landscape and ecology terms the site should be viewed in three parcels:
- The western third (8A) having a low suitability for development which meant development would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between settlements, the setting to existing settlement or the South Downs National Park.
  - The middle third (8B) having a medium/high suitability for development which means the site could accommodate urban extensions and/or infill sites, due to their generally lower sensitivity or value, provided sensitive considerations are taken into account, in particular the setting to the South Downs National Park.
  - The eastern third (8C) having a high suitability for development which could accommodate allocations of new development without significant detrimental effects on the character of the landscape as a whole provided the form of new development proposals are closely related to, and in scale with, existing adjacent settlement.
- 3.79 This site was included in the 2016 Issues and Options consultation document as a potential edge of town site. This site had already been highlighted in the Worthing Core Strategy (2011) as a potential future development area (PFDA) with a capacity to accommodate a further 375 dwellings.
- 3.80 The site was further assessed in landscape and ecology terms through the Review of Low Suitability Sites 2017 which re-assessed parcel 8A but concluded that it still had low suitability. As with other sites with low suitability development on this parcel was not considered suitable.
- 3.81 Following the Issues and Options Consultation Land north of West Durrington (excluding the parcel 8A) was granted planning permission (AWDM/1882/16) at Worthing Planning Committee on 6 December 2017 for 240 dwellings. The planning decision was issued 18 December 2019 and the site has since been granted reserved matters and construction is underway. Therefore this site was not taken forward in the Draft Local Plan.

### **Worthing Leisure Centre**

#### **SA Site Criteria Summary**

Opportunities: • Site is within the Built Up Area Boundary • The site is within 800m of Goring Road District Centre and The Strand Local Centre

Constraints: •The site contains accessible open space and indoor sport facilities • Parts of the site are at a medium risk of surface water and groundwater flooding

- 3.82 This site was included in the Draft Local Plan as an area of change (AOC4) with an indicative capacity tbc. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

AOC4 Worthing Leisure Centre								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	?	-	+	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	?	++	0	?	+	0

- 3.83 Following the consultation on the Draft Local Plan officers reported that the Council was due to update its Sport, leisure and Open Space Study and appoint a master-planner to develop a range of options for how the site could be developed, to include leisure use, public open space and housing. It was hoped that greater delivery certainty would be provided following a full feasibility assessment, options appraisal and business case to enable the site to become an allocation in the next version of the Plan.

- 3.84 The Adur and Worthing Councils Built and Indoor Sports Facility (2019) made the following comments on the site Worthing Leisure Centre:

*Refurbishments have sustained an ageing building well in places, although areas are in need of investment and modernisation. The fitness gym is of insufficient size for the centre. The changing rooms have been refurbished. The entire catering and bar areas require overhaul and are insufficient to meet peak-time demand. Many functions that might have used these facilities will not use the prestigious Field Place complex. The entrance/reception is inadequate for major events, and at peak-time. The car park is large but at full capacity at peak times. Outside facilities include a synthetic 6-lane running track; hammer throwing and training area; 6 x 3G 'caged' pitches; a grass pitch. Given the age of the original facility, both the local authority and SDLT are actively considering future options for the venue, which include 'remain and repair', rebuild on the current site; and, 'rebuild on a different site'.*

- 3.85 The study recommends that a 'New Build' (on-site) option appears the best option for the site. The study also recognised that in addition to the strong political commitment to upgrade/replace/expand facilities at the site of the existing Leisure Centre the athletics track adjacent to the Centre is in good condition but needs additional ancillary provision to support the growth of local athletics activity.

- 3.86 The site was not taken forward to the Submission Draft Worthing Local Plan (2021)

as whilst further work continues to look at the possible opportunities for this site there is a significant level of uncertainty regarding the scope of development and timescales for delivery which make it unsuitable for allocation at this time. For this reason no other reasonable alternatives were identified.

### Worthing United Football Club

#### SA Site Criteria Summary

Opportunities: • The site is in Flood Zone 1. • Located within the Built Up Area Boundary • within 800m of West Durrington District Centre

Constraints: • Within Source Protection Zone 1. • The site is adjacent to the South Downs National Park to the north and west and is considered to form part of the undeveloped southern setting • The site is located to the east of the Castle Goring Conservation Area relatively close to a number of Listed Buildings.

- 3.87 The site was assessed through the 2015 Landscape and Ecology Study which concluded that in landscape and ecology terms the site has a medium/high suitability for development which means the site could accommodate urban extensions and/or infill sites, due to their generally lower sensitivity or value, provided sensitive considerations are taken into account, in particular the setting to the South Downs National Park.
- 3.88 This site was included in the 2016 Issues and Options consultation document as a potential site. However the need to relocate or potential loss of the existing football club on the site meant this site was included as an omission site in the Draft Local Plan (OS3) with the key constraint being listed as protection of playing field / football club due to the lack of alternative sites.
- 3.89 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

OS3 Worthing United Football Club								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	-	/	-	-	0	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	?	0	?	?	0	0	0	?

- 3.90 In response to the consultation, officers reported that consideration would be given to the evidence submitted by the site promoter to assess whether the access constraint could be overcome.
- 3.91 The 2019 Adur and Worthing Playing Pitch Strategy listed the need to find a possible

relocation (and preferably enhanced pitch) site for Worthing United FC as a specific priority for football.

- 3.92 As the Submission Draft Local Plan was prepared a suitable site for relocation had yet to be identified and so having consideration to the findings of the Playing Pitch Strategy no reasonable alternatives for the site were identified and the site was not included as an allocation. However, reference to the site's longer term potential is made within the Beeches Avenue allocation.

## Dale Road

### SA Site Criteria Summary

Opportunities: • It is a brownfield site providing an opportunity for regeneration. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.

Constraints: • High risk of groundwater flooding. • Development could potentially result in the loss of employment space. • Within an area containing recorded archaeological remains.

- 3.93 This is an area of land identified in the Core Strategy (2011) as being within the boundary of but disused part of Brooklands Pleasure Park. It is a historic landfill site and the levels of contamination mean the site would be unsuitable for residential development. However, given the development pressures consideration was given to whether the site would be suitable for employment uses.
- 3.94 The site was considered as part of the Landscape Ecology Study Addendum (2017) which found it to have a low/medium suitability for development in landscape visual and ecology terms.
- 3.95 Paragraph 11b) ii. of the NPPF requires strategic policies to provide for objectively assessed needs for housing and other uses unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. As with other sites that the Landscape and Ecology Study concluded had low suitability for development or less, the options of allocating or protecting the site were identified and appraised through the SA under Policy PA3: Brooklands Recreation Area within the DIIA (Appendix F) to determine whether this test could be met.

Option 1 Retaining the north west portion of the site (known as Dale Road) and 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 the north west portion of the site (known as Dale Road) for development:

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.

The option to protect the site was found to be the most sustainable option overall. The option to protect the site excluding the north western corner (known as Dale Road) was not tested however the appraisal of allocating that part of the site shows it has very negative effects associated with the sensitivity of the site in terms of landscape and character

- 3.96 For the purposes of the Local Plan this site continued to form part of Brooklands Recreation Area and as such it was not included in any versions of the Local Plan as a site on its own. Brooklands Recreation Area was included in the Submission Draft Local Plan under policies SS4, SS5, SS6.

### Chatsmore Farm

#### SA Site Criteria Summary

Opportunities: • The site is in a sustainable location within walking distance of Goring train station.

Constraints: • The Ferring Rife flows through the centre of the site. • Grade 1 Agricultural Land. • Parts of the site are in Flood Zone 3 and have a high chance of surface water and groundwater flooding. • Prominent in views from SDNP and considered to form part of its undeveloped setting. • Provides an essential sense of separation between Goring and Ferring. • Within an area containing recorded archaeological remains.

- 3.97 The Landscape and Ecology Study (2015) assessed the suitability of development of the potential greenfield sites in terms of landscape, visual impact and ecology. This concluded that the majority of the site (5A) had negligible to low suitability for development. Development in this area would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between



settlements, the setting to existing settlement or the South Downs National Park. However the study did recognise that the south west corner of the site (5B) was slightly less sensitive with a low suitability for development.

- 3.98 The site was included in the Issues and Options consultation as 1 of 8 potential edge of town sites that were being assessed. The consultation document described the site as a 28.1ha site located in the west of the Borough, which consists of open/arable land in agricultural use.
- 3.99 The Summary of Representations Report summarises the representations received during the Worthing Local Plan Issues & Options consultation. 183 respondents (70% of the total) raised strong concerns about the potential development of Goring Ferring Gap and Chatsmore Farm.
- 3.100 The Review of Low Suitability Sites (2017) re-assessed 5B (part of the Chatsmore Farm site) in combination with a new Site 5C located within Arun District at Green Park. This resulted in sites 5B and 5C being amended to having medium suitability for development. Those sites with medium suitability were then considered for allocation. However the option of allocating parcels 5B and 5C at Chatsmore Farm was screened out of the SA as there is currently no realistic means of access to this part of the site which lies mostly within Arun District. The 2017 updates to the Landscape and Ecology Study still concluded the main part of the site (parcel 5A) had a negligible/low suitability for development.
- 3.101 Paragraph 11b) ii. of the NPPF requires strategic policies to provide for objectively assessed needs for housing and other uses unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. As with other sites that the Landscape and Ecology Study concluded had low suitability for development or less, the options of allocating or protecting the site were identified and appraised through the SA under Policy PA2: Chatsmore Farm within the DIIA (Appendix F) to determine whether this test could be met.

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 1 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.

The option to protect the site from inappropriate development is considered to be the most sustainable scoring positively overall. This is despite a very negative effect associated with the loss of housing delivery, which it is not considered possible to mitigate.

- 3.102 Following this, as the evidence had recommended that the site was unsuitable for development and taking into consideration the findings of the SA, options were considered as to how this land should be protected, and the site was included in the Draft Local Plan and Submission Draft Local Plan under policies SS4, SS5, SS6.
- 3.103 A planning application for the site was submitted to the Council in August 2020 for 475 homes on the site (AWDM/1264/20). This was refused by the Council in March 2021 and that decision is being appealed. In reaching this decision the Council sought further landscape advice from the same consultants that prepared the Landscape and Ecology Study which supported the Local Plan. This was received in November 2020 prior to the Submission Draft Worthing Local Plan consultation and was in line with the previous Local Plan landscape evidence. Their advice concluded that:

*Substantial adverse landscape and visual effects would arise from the development: such impacts would affect the local area and the wider landscape, including the landscape setting to the National Park, Highdown Hill scheduled Monument and the conservation area and the sea views from the National Park. The development would substantially close the gap between Goring by Sea and Ferring adversely affecting the separate identities of the settlements.*

- 3.104 It is important to note that the Council continue to view development positively and in seeking to meet its local housing need if this advice had suggested that development could be suitable or sufficiently mitigated then the allocation of this portion of the site would have been considered as an option in the SA.

### **Goring Ferring Gap**

#### **SA Site Criteria Summary**

Opportunities: • Northern part of the site is in a sustainable location within walking distance of Goring train station.

Constraints: • Parts of the site are in Flood Zone 3 and have a high chance of surface water flooding. • The site forms effective physical and visual separation between Goring and Ferring. • Contributes to the rurality and undeveloped character of the coastline. • Visible from SDNP and provides a visual link between the NP and undeveloped coastline. • Development could potentially result in the loss of accessible open space.

- 3.105 The Landscape and Ecology Study (2015) assessed the suitability of development of the potential greenfield sites in terms of landscape, visual impact and ecology. This concluded that the majority of the site (4A) had negligible suitability for development.

Development in this area would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between settlements, the setting to existing settlement or the South Downs National Park. The study did recognise that the north eastern corner of the site was slightly less sensitive and assessed it as having a negligible / low sensitivity.

- 3.106 The site was included in the Issues and Options consultation as 1 of 8 potential edge of town sites that were being assessed. The consultation document described the site as a 32ha site located in the south west of the Borough, which mainly consists of open agricultural land. There are playing fields in the north east part of the site.
- 3.107 The Summary of Representations Report summarises the representations received during the Worthing Local Plan Issues & Options consultation. 183 respondents (70% of the total) raised strong concerns about the potential development of Goring Ferring Gap and Chatsmore Farm.
- 3.108 The 2017 updates to the Landscape and Ecology Study still concluded the site had negligible and negligible / low suitability for development.
- 3.109 Paragraph 11b) ii. of the NPPF requires strategic policies to provide for objectively assessed needs for housing and other uses unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. As with other sites that the Landscape and Ecology Study concluded had low suitability for development or less, the options of allocating or protecting the site were identified and appraised through the SA under Policy PA1: Goring - Ferring Gap within the DIIA (Appendix F) to determine whether this test could be met.

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.

The option to protect the site from inappropriate development is considered to be the most sustainable scoring positively overall. This is despite a very negative effect associated with the loss of housing delivery, which it is not considered possible to mitigate.

- 3.110 Following this, as the evidence had recommended that the site was unsuitable for

development and taking into consideration the findings of the SA, options were considered as to how this land should be protected, and the site was included in the Draft Local Plan and Submission Draft Local Plan under policies SS4, SS5, SS6.

## A1 Beeches Avenue

### SA Site Criteria Summary

Opportunities: • The site is in Flood Zone 1.

Constraints: • In close proximity to the AQMA. • Within Source Protection Zone 1. • Adjoins SDNP to the north.

- 3.111 The Landscape and Ecology Study (2015) assessed the suitability of development of the potential greenfield sites in terms of landscape, visual impact and ecology. It found this site to have a medium/high suitability for development meaning it could accommodate urban extensions and/or infill sites, due to its generally lower sensitivity or value, provided sensitive considerations are taken into account, in particular the setting to the South Downs National Park.
- 3.112 Land at Beeches Avenue was included in the 2016 Issues and Options Consultation as a potential site.
- 3.113 The site was included in the Draft Local Plan as an omission site (OS2) with the key constraint being identified as access. The transport study concluded that Beeches Avenue would not provide a suitable access. An alternative access using Lyons Way had been suggested by the site promoter but further work was needed to understand whether this was possible without compromising the operation of the Football Club on the adjacent site.
- 3.114 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

OS2 Land north of Beeches Ave								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	-	-	-	-	0	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	?	0	0	-	0	?

- 3.115 Officers responses to the representations received to the Draft Local Plan consultation explained that consideration will be given to the evidence submitted by the site promoter to assess whether the identified constraints could be overcome.
- 3.116 The Submission Draft Local Plan included the site as a housing allocation as it was

considered that the alternative access using Lyons Way overcame the previously identified constraints. No reasonable alternatives for development options were identified as capacity was dictated by landscape and highways constraints.

- 3.117 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by incorporating measures that deliver mitigation in line with the requirements of the Worthing Air Quality Action Plan, enhancing biodiversity to achieve net gains, requiring a SuDs scheme that protects water quality and improving walking links and access into the National Park. The results of its appraisal are copied below:

A1 - Beeches Avenue								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	-	-	-	-	/	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	?	?	0	0	+

- 3.118 Including this site as an allocation scores more positively than when it was included as an omission site particularly in against objectives 9, 11 and 16.

## A2 Caravan Club, Titnore Lane

SA Site Criteria Summary
<p>Opportunities: • The site is in Flood Zone 1.</p> <p>Constraints: • Titnore &amp; Goring Woods Complex Local Wildlife Site (including ancient woodland) borders the site.</p>

- 3.119 The site was included in the Draft Local Plan as allocation A1 with an indicative capacity of 75 residential units.
- 3.120 The site was assessed through the 2015 Landscape and Ecology Study which concluded that in landscape and ecology terms the site has a medium / high suitability for development which is defined as sites that could accommodate urban extensions and/or infill sites, due to their generally lower sensitivity or value, provided sensitive considerations are taken into account, in particular the setting to the South Downs National Park.
- 3.121 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

A1 Caravan Club								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	-	-	-	+	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	0	0	/	0	+

3.122 Responding to the consultation responses received to the Draft Local Plan, officers commented that it is expected that the allocation will remain largely unchanged.

3.123 Whilst preparing the Submission Draft Local Plan the site was renumbered as A2 and further discussions with Council teams as site owners revealed that more detailed assessments of site capacity indicated that a min of 100 units could be sustainably accommodated on the site. Therefore, the indicative capacity increased to 100 dwellings (from 75). The requirements for Plans to be positively prepared and make sufficient provision for housing means that where capacity of a site can be increased (and reduce the shortfall in meeting local housing needs), there are no reasonable alternatives.

3.124 In addition reference has now been added to ancient woodland and protection of the Local Wildlife Site. Whilst these were not tested individually as reasonable alternatives it can be seen by the appraisal of this policy that it has resulted in little change:

3.125 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by enhancing biodiversity to achieve net gains, delivery of a SuDS scheme and enhancing boundary vegetation to limit views of the site from the National Park. The results of its appraisal are copied below:

A2 - Caravan Club, Titnore Lane								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	-	-	-	-	/	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	?	?	/	0	/

3.126 This appraisal shows a number of changes compared with the previous appraisal, but overall the site scores very similarly. Objective 5 Water Management changed from positive to negative as since the previous appraisal the SFRA has been undertaken which identifies the eastern section of the site as being at a high risk of groundwater flooding. Objective 6 Landscape and Character changed from negative to neutral to take account of mitigation. Objective 16 Travel and Access changed

from positive to neutral as it is not expected that this allocation would have any significant impacts on improving access to sustainable modes of transport.

- 3.127 In line with the NPPF the Exception Test was applied. This appraisal demonstrates that development would provide wider sustainability benefits to the community that outweigh the flood risk and therefore part a) of the Test is passed. Part b) of the Test is set out in the Flood Risk Sequential and Exception Test that accompanied the Submission Draft Local Plan and uses information from the Level 2 SFRA. Therefore both elements of the Exception Test have been satisfied and development can be allocated in accordance with para 165 of the NPPF.

### A3 Centenary House

#### SA Site Criteria Summary

Opportunities: • It is a brownfield site providing an opportunity for regeneration. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.

Constraints: • High risk of groundwater flooding. • Development could potentially result in the loss of employment space. • Within an area containing recorded archaeological remains.

- 3.128 This site was included in the Draft Local Plan as an Area of Change for 100 residential units and 10,000 sqm re-provided employment floorspace.

- 3.129 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

AOC1 Centenary House								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	+	0	+	0	0

- 3.130 In reviewing representations received to the Draft Local Plan, officers commented that it was hoped that greater delivery certainty would be achieved allowing the site to become an allocation rather than an area of change.
- 3.131 From the Draft and Submission Draft Local Plan the indicative capacity for the site increased to 250 dwellings. Ongoing discussions between West Sussex County Council and Police (that currently occupy the site) resulted in a new shared accommodation approach which will increase surplus plot space. The requirements for Plans to be positively prepared and make sufficient provision for housing means

that where capacity of a site can be increased (and reduce the shortfall in meeting local housing needs), there are no reasonable alternatives and for this reason no options were identified other than to increase the amount of residential development that can be accommodated on this site.

- 3.132 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effect by delivering a SuDS scheme to address the high risks posed by groundwater flood risk and future surface water flooding as a result of climate change. The results of its appraisal are copied below:

A3 - Centenary House								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	--	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	++	+	++	?	++	0	/

- 3.133 The results of this appraisal show the changes made to the policy, primarily the change from an area of change to an allocation has resulted in the policy scoring more positively overall. In particular Objective 10 Crime and Public Safety is now scoring as having very positive effects as the redevelopment will provide enhanced facilities for Sussex Police, Objective 12 Communities has gone from scoring positive to very positive effects due to the redevelopment of the site providing an opportunity to deliver a multi-agency hub offering integrated and co-located public services which will benefit local communities, and Objective 14 Economy has also changed from positive to very positive effects due to the delivery of improved employment space. In contrast it should be highlighted that Objective 5 Water Management now scores as having very negative effects as since the previous appraisal the SFRA has been undertaken which identifies the site as being at a high risk of groundwater flooding with a significant increase in surface water flood risk in the future due to climate change. Mitigation has been identified to minimise these effects.
- 3.134 In line with the NPPF the Exception Test was applied. This appraisal demonstrates that development would provide wider sustainability benefits to the community that outweigh the flood risk and therefore part a) of the Test is passed. Part b) of the Test is set out in the Flood Risk Sequential and Exception Test that accompanied the Submission Draft Local Plan and uses information from the Level 2 SFRA. Therefore both elements of the Exception Test have been satisfied and development can be allocated in accordance with para 165 of the NPPF.

#### A4 Civic Centre, Stoke Abbott Road

### SA Site Criteria Summary



Opportunities: • The site is in a sustainable location within walking distance of Worthing train station. • It is a brownfield site providing an opportunity for regeneration. • It is located in the Town Centre. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.

Constraints: • Development could potentially result in the loss of a doctor's surgery. • Within an area containing recorded archaeological remains.

- 3.135 This site was included in the Draft Local Plan as A8 Civic Centre Car Park with an indicative capacity of 64 residential units and healthcare facility. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

A8 Civic Centre Car Park								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	0	0	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	++	0	+	0	0

- 3.136 In preparing the Submission Draft Local Plan the site was renumbered A4 and the indicative capacity reference to 64 dwellings was deleted and the allocation is now just for the proposed health hub. This was informed through discussions with health practitioners which indicated that the whole site was needed for the health hub to fit the 'new' health model of integrated services. This meant that there was no longer any surplus site space available for alternative uses such as residential and as a result no no reasonable alternatives to removing the residential development have been identified. However the appraisal of this policy as part of the total effects has been updated to reflect the change in uses.

- 3.137 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by delivering a SuDS scheme, protecting heritage assets and their settings and to maximise positive effects by creating and enhancing pedestrian routes to the town centre. The results of this appraisal are copied below:

A4 - Civic Centre, Stoke Abbott Road								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	-	0	+	-
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	++	0	/	++	0	?	0	+

3.138 The appraisal now scores very positive against Objective 9 Healthy Lifestyles due to the allocation of the site for a new health hub and positive against Objective 16 Travel and Access due to the potential of the site to enhance pedestrian routes to the town centre. There are new negative scores against Objective 5 Water Management as the SFRA identifies the site as being at medium risk of groundwater flooding and Objective 8 Historic Environment as the site is located adjacent to several Listed Buildings. Mitigation has been identified to minimise these negative effects. It should also be noted that Objective 11 Housing has changed from scoring very positive effects to neutral reflecting the deletion of residential development on this site and Objective 14 Economy has changed from positive to uncertain as the new health hub will be formed through the relocation of existing services so it is unclear whether this will provide new jobs.

### A5 Decoy Farm

SA Site Criteria Summary								
<p>Opportunities: • The site is in a sustainable location within walking distance of East Worthing train station. • It is a vacant brownfield site providing an opportunity for regeneration. • Located within the Built Up Area Boundary.</p> <p>Constraints: • In close proximity to the AQMA. • The Teville Stream flows along the edge of the site. • Significant levels of contaminated land. • Parts of the site are at a high chance of flooding from rivers, surface water and groundwater</p>								

3.139 The site is on a former landfill and contamination investigations have demonstrated that residential development would not be viable on this site due to the level of contaminated land remediation that would be required for this use therefore no reasonable alternatives were identified for different uses on this site.

3.140 This site was included in the Draft Local Plan as A4 Decoy Farm with an indicative capacity of a minimum of 28,000 sqm commercial. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

A5 Decoy Farm ( formerly A4 Decoy Farm)								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	-	+	-	+	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	++	0	0

3.141 In preparing the Submission Draft Local Plan the indicative capacity has been

decreased from a minimum of 28,000 sqm to 15,000s qm. This has been informed through appointment of a project team and development of a masterplan for the site that has been needed to allow for landscape & biodiversity & habitat protection gaps and buffers.

- 3.142 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by ensuring the Teville Stream is protected from contamination during remediation and construction, protecting and enhancing valued habitats to achieve a net gain in biodiversity, locating the most vulnerable uses in the parts of the site with lowest flood risk and delivering a SuDS scheme and protecting and enhancing the character of the Local Green Gap. Positive effects should be maximised by facilitating pedestrian routes across the Gap. The results of its appraisal are copied below:

A5 Decoy Farm								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	-	+	-	-	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	++	0	+

- 3.143 The appraisal between the two versions of the policy show very similar effects reflecting the minor changes made. Objective 5 Water Management changed from scoring positive to negative effects as the SFRA identified that small parts of the site are in Flood Zone 3 and / or at a high risk of surface and groundwater flood risk. Objective 16 Travel and Access changed from having no effects to positive effects due to the potential for the site to help facilitate pedestrian links across the Local Green Gap proposed by the local community.
- 3.144 In line with the NPPF the Exception Test was applied. This appraisal demonstrates that development would provide wider sustainability benefits to the community that outweigh the flood risk and therefore part a) of the Test is passed. Part b) of the Test is set out in the Flood Risk Sequential and Exception Test that accompanied the Submission Draft Local Plan and uses information from the Level 2 SFRA. Therefore both elements of the Exception Test have been satisfied and development can be allocated in accordance with para 165 of the NPPF.

## A6 Fulbeck Avenue

SA Site Criteria Summary
<p>Opportunities: • The site is in Flood Zone 1. • Located within the Built Up Area Boundary</p> <p>Constraints: • Treelines and scrub forming the northwestern site boundary from part of the Titnore &amp; Goring Woods Complex Local Wildlife Site. • Parts of the site have a high</p>

chance of surface water flooding. • Development would result in the loss of Natural / Semi-Natural accessible greenspace, though this is assessed as being of low quality and value.

3.145 The site was assessed through the 2015 Landscape and Ecology Study which concluded that in landscape and ecology terms the site can be viewed as two parcels of land:

- The northern half (7B) having a medium suitability for development for proposals which would 'round off' a settlement or develop infill sites, but would need to demonstrate no adverse impacts on the setting to the National Park or the wider landscape, and should have regard for the setting and form of existing settlement and the character and sensitivity of the adjacent landscapes.
- The southern half (7A) having a high suitability for development which could accommodate allocations of new development without significant detrimental effects on the character of the landscape as a whole provided the form of new development proposals are closely related to, and in scale with, existing adjacent settlement.

3.146 This site was included in the Draft Local Plan as allocation A2 Land west of Fulbeck Ave with an indicative capacity of 50 residential units. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

A2 Land west of Fulbeck Ave								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	-	-	-	+	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	0	0	0	0	0

3.147 Having reviewed the representations received to the Draft Local Plan, officers acknowledged that the SFRA needed updating to provide a Level 1 assessment and Level 2 assessment for those sites that require the Exceptions Test. This will include those sites at risk from other sources of flooding and will also need to consider cumulative impact as required by the NPPF.

3.148 In preparing the Submission Draft Local Plan the indicative capacity has been increased to 120 dwellings (from 50) this has been informed through pre-application discussions with developers which suggested a higher density scheme could be accommodated on this site resulting in the submission of Application AWDM/0166/20 for 152 dwellings. To ensure the Local Plan policy requirement remains a minimum figure, a capacity of 120 dwellings was set to provide an optimistic but realistic figure reflecting the development proposed in the application. The requirements for Plans to

be positively prepared and make sufficient provision for housing means that where capacity of a site can be increased (and reduce the shortfall in meeting local housing needs), there are no reasonable alternatives and for this reason no options were identified other than to increase the amount of residential development that can be accommodated on this site.

- 3.149 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by protecting and enhancing valued habitats to achieve biodiversity net gain, locating the most vulnerable uses in the parts of the site with lowest flood risk, ensuring development is informed by a Flood Risk Assessment that considers all sources of flooding demonstrates that development is safe and reduces flood risk overall, and retaining and enhancing woodland to minimise the impact on views from the National Park. The results of its appraisal are copied below:

A6 - Fulbeck Avenue								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	-	-	-	--	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	?	?	0	0	/

- 3.150 The appraisals between the two versions of the policy are broadly similar. The main change is the scoring against Objective 5 Water Management which changed from positive to very negative effects. This was as a result of the SFRA identifying that a small section of the site in the north and centre is located within Flood Zone 3b and a further northern section of the site is within 3a. In addition large portions of the site are at a high risk of surface water and groundwater flooding and would also be affected in the event that Somerset Lake breached which could cause flood depths up to 1.6m on the site. Mitigation has been identified to avoid and minimise these effects.
- 3.151 In line with the NPPF the Exception Test was applied. This appraisal demonstrates that development would provide wider sustainability benefits to the community that outweigh the flood risk and therefore part a) of the Test is passed. Part b) of the Test is set out in the Flood Risk Sequential and Exception Test that accompanied the Submission Draft Local Plan and uses information from the Level 2 SFRA. Therefore both elements of the Exception Test have been satisfied and development can be allocated in accordance with para 165 of the NPPF.

## A7 Grafton

### SA Site Criteria Summary

Opportunities: • It is a brownfield site providing an opportunity for regeneration. • It is located in the Town Centre. • Located within the Built Up Area Boundary.

Constraints: • The majority of the site is in Flood Zone 3. • Development could potentially result in the loss of a small area of amenity greenspace

- 3.152 This site was included in the Draft Local Plan as allocation A7 with an indicative capacity of 113 residential units and 2,979 sqm commercial. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

A7 Grafton								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	+	0	++	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	0	0	++	++	+

- 3.153 The Worthing Town Centre Retail Study Update (2020) recommended that the Grafton site presents the strongest opportunity in the town centre to create 'space' and to link the beach/seafront with the wider town centre. The incorporation of a green park area/open space and sightlines should be considered.

- 3.154 In preparing the Submission Draft Local Plan the indicative capacity of the site was increased to 150 dwellings (from 113) and floorspace reduced to 2,500 sqm (from 2,979 sqm), due to site constraints and viability. Residential development is an important component of the scheme to ensure viability and help meet local housing needs. However the recognition of the sites importance in the Town Centre Study meant a solely residential scheme was not considered as a reasonable alternative.

- 3.155 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by ensuring development is safe and reduces the overall level of flood risk, seeking to improve the setting of heritage assets and to maximise positive effects by enhancing pedestrian routes between the seafront and primary shopping area.

The results of its appraisal are copied below:

A7 - Grafton								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	--	0	+	-
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.

Score	0	+	+	?	?	+	++	+
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- 3.156 Despite there only being minor changes in the indicative capacity for the site, the appraisal at this stage did score differently across a number of objectives. Most notably, the score against Objective 5 Water Management changed from positive to very negative effects as the SFRA identified parts of the site are within Flood Zone 3 and that this is likely to cover the whole site with climate change and Objective 8 Historic Environment changed from positive to negative effects recognising the potential risk to surrounding Conservation Areas and the Lido, a Grade II Listed Building. Mitigation was identified to minimise these effects.
- 3.157 In line with the NPPF the Exception Test was applied. This appraisal demonstrates that development would provide wider sustainability benefits to the community that outweigh the flood risk and therefore part a) of the Test is passed. Part b) of the Test is set out in the Flood Risk Sequential and Exception Test that accompanied the Submission Draft Local Plan and uses information from the Level 2 SFRA. Therefore both elements of the Exception Test have been satisfied and development can be allocated in accordance with para 165 of the NPPF.

#### **A8 HMRC Offices, Barrington Road**

##### **SA Site Criteria Summary**

**Opportunities:** • The site is in a sustainable location within walking distance of Durrington train station. • It is a brownfield site providing an opportunity for regeneration. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.

**Constraints:** • Potentially contaminated land. • High chance of surface water flooding and records of historic flooding. • Development could potentially result in the loss of employment space

- 3.158 This site was included in the Draft Local Plan as an area of change AOC5 HMRC Offices, Barrington Rd with an indicative capacity of 250 residential units and 2,500 sqm B1 reprovided from an existing 20,830 sqm. Much of the site is currently vacant and discussions with site promoters highlighted that HMRC would rationalise the use of its site to the eastern part. The Worthing Economic Research & Employment Land Review (2016) recommended that given the level of need for employment land and the lack of other available sites in the Borough, it will be important to ensure that the opportunity to enhance the provision of employment land in the area is maximised. Therefore although it was possible to accommodate some residential on this site to help meet local housing needs, a solely residential scheme on this site was not considered to be a reasonable alternative. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

AOC5 HMRC Offices, Barrington Rd								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	0	0	/	+	+

3.159 In reviewing representations received to the Draft Local Plan, officers commented that it was hoped that greater delivery certainty would be achieved allowing the site to become an allocation rather than an area of change.

3.160 In preparing the Submission Draft Local Plan the nib to the west of the main site and indicative capacity for B1 floorspace has been removed and moved to site A10 to better enable the former gasholder site to come forward. This has been informed through representations received in response to the Draft Local Plan consultation and ongoing pre-application discussions with site promoters for both sites to best enable all parcels of land to come forward for development.

3.161 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by delivery of a SuDS scheme and to maximise positive effects by improving access to Durrington train station. The results of its appraisal are copied below:

A8 - HMRC Offices, Barrington Road								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	-	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	?	?	-	+	+

3.162 Compared with the previous appraisal the scoring against Objective 5 Water Management and Objective 14 Economy are now scoring as having negative effects due to the SFRA identifying the site as being at a medium risk of groundwater flooding and the loss of employment floorspace, although this will be mitigated through the changes to site A10.

## A9 Lyndhurst Road

SA Site Criteria Summary	
Opportunities: • The site is in a sustainable location within walking distance of Worthing train station. • It is a vacant brownfield site providing an opportunity for regeneration. • It is	



located in the Town Centre. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.

Constraints: • Significant levels of contaminated land. • Within an area containing recorded archaeological remains.

- 3.163 This site was included in the Draft Local Plan as an area of change AOC2 British Gas Lyndhurst Rd with an indicative capacity of 85 residential units. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

AOC2 British Gas Site, Lyndhurst Rd								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	0	0	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	0	0	?	+	+

- 3.164 In reviewing representations received to the Draft Local Plan, officers commented that it was hoped that greater delivery certainty would be achieved allowing the site to become an allocation rather than an area of change.
- 3.165 From the Draft and Submission Draft Local Plan the indicative capacity has been increased to 150 dwellings (from 85), this has been informed through pre-application enquiries with applicants and needed to ensure a scheme can be viable given the costs of contaminated land remediation whilst still appropriate given the lower density characteristics of the local area. The requirements for Plans to be positively prepared and make sufficient provision for housing means that where capacity of a site can be increased (and reduce the shortfall in meeting local housing needs), there are no reasonable alternatives and for this reason no options were identified other than to increase the amount of residential development that can be accommodated on this site.
- 3.166 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects through development of a SuDS scheme and to maximise positive effects by providing attractive and accessible pedestrian and cycle routes to the High Street and town centre. The results of its appraisal are copied below:

A9 - Lyndhurst Road								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	-	0	++	0

SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	?	?	0	+	+

3.167 The appraisals of the two versions of the policy are broadly similar. The scoring to Objective 5 Water Management has changed to a score of negative effects as the SFRA identifies the site is at a medium risk of groundwater flooding. The scoring to Objective 7 Built Environment has changed to a score of very positive effects reflecting the benefits of redeveloping a vacant site.

#### A10 Martlets Way

SA Site Criteria Summary								
<p>Opportunities: • The site is in a sustainable location within walking distance of Durrington train station. • It is a vacant brownfield site providing an opportunity for regeneration. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.</p> <p>Constraints: • Significant levels of contaminated land</p>								

3.168 This site was included in the Draft Local Plan as an area of change AOC6 Martlets Way with an indicative capacity of 10,000 sqm employment. The site is adjacent to the Goring Business Park and therefore access from either Martlets Way or Woods Way would be suitable to support industrial / warehousing uses on this part of the site as recommended in the Employment Land Review, expanding the existing Goring Business Park. The need to protect the ongoing activities on the existing Business Park along with the significant levels of land contamination mean this site would not be suitable for residential uses and therefore no reasonable alternatives in terms of mix of uses were identified.

3.169 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

AOC6 Martlets Way								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	++	0	+

3.170 In reviewing representations received to the Draft Local Plan, officers commented that it was hoped that greater delivery certainty would be achieved allowing the site to become an allocation rather than an area of change.

3.171 In preparing the Submission Draft Local Plan the site area has been amended to include the 'nib' and text added to clarify that there may be scope for residential development to be served via the HMRC site (on the nib), if it can be demonstrated that this secures the delivery of employment floorspace at Martlets Way and does not prejudice the bringing forward of the former gasholder site. This has been informed through representations in response to the Draft local Plan to best enable all parcels of land to come forward for development and ongoing pre-application discussions with site promoters on both sites. In terms of the SA, unlike the rest of Martlets Way the nib is considered suitable for residential development as it can be served by alternative access and would not compromise activities on the existing Business Park, therefore to help meet local housing needs no reasonable alternatives have been identified.

3.172 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects on water management through delivery of a SuDS scheme. The results of its appraisal are copied below:

A10 - Martlets Way								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	-	0	++	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	/	0	0	++	+	/

3.173 The changes to the policy resulted in different scoring to particularly Objectives 5 Water Management which now scores as a negative effect as the SFRA identifies the site is at a medium risk of groundwater flooding, Objective 7 Built Environment which now scores as a very positive effect reflecting the benefits of redeveloping a vacant site and Objective 15 Town and Local Centres which now scores as having a positive effect recognising how redevelopment may support vitality of the nearby Local Centre.

### **A11 Stagecoach, Marine Parade**

SA Site Criteria Summary	
<p>Opportunities: • It is a brownfield site providing an opportunity for regeneration. • It is located in the Town Centre. • Located within the Built Up Area Boundary.</p>	
<p>Constraints: • A significant portion of the site is located in Flood Zone 3. • Potentially contaminated land. • The Dome Cinema, a Grade II* Listed Building is located along the southern boundary of the site, and there are a number of other heritage assets</p>	

surrounding the site. • Within an area containing recorded archaeological remains. • Development of the site could potentially result in the loss of employment space.

- 3.174 This site was included in the Draft Local Plan as an area of change AOC3 Stagecoach, Marine Parade with an indicative capacity of 60 residential units and 3,500 sqm leisure / retail. The Worthing Retail & Town Centre Uses Study (2017) concluded that sequentially this site (along with 2 others) should form the priority for new/additional floorspace, however given the physical constraints of the site and its location next to the Dome Cinema, cultural uses may be more suitable especially if supported by improved linkages between Warwick Street and the seafront. The importance of this site in delivering town centre uses and lack of alternative options meant a solely residential scheme on this site was not considered as a reasonable alternative. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

AOC3 Stagecoach, Marine Parade								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	+	0	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	0	0	+	++	0

- 3.175 In reviewing representations received to the Draft Local Plan, officers commented that it was hoped that greater delivery certainty would be achieved allowing the site to become an allocation rather than an area of change.

- 3.176 In preparing the Submission Draft Local Plan the indicative capacity was reduced from 3,500 sqm to 2,000 sqm following further capacity assessments with site promoters to ensure the minimum 60 dwelling requirement is deliverable.

- 3.177 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by ensuring development is safe from flood risk and reduces the risk overall, sensitive to nearby heritage assets and helps enhance their setting, and to maximise positive effects by providing attractive and accessible pedestrian links between the seafront and Warwick Street.

The results of its appraisal are copied below:

A11 - Stagecoach, Marine Parade								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	--	0	+	-

SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	+	?	?	+	++	+

3.178 Objective 5 Water Management now scores as having very negative effects as the SFRA identified part of the site in Flood Zone 3, with the whole site affected in the future due to climate change. Objective 8 Historic Environment scored negatively highlighting the potential risk to nearby heritage assets particularly the Grade II\* Dome Cinema. Mitigation has been proposed to minimise these negative effects and maximise positive effects.

3.179 In line with the NPPF the Exception Test was applied. This appraisal demonstrates that development would provide wider sustainability benefits to the community that outweigh the flood risk and therefore part a) of the Test is passed. Part b) of the Test is set out in the Flood Risk Sequential and Exception Test that accompanied the Submission Draft Local Plan and uses information from the Level 2 SFRA. Therefore both elements of the Exception Test have been satisfied and development can be allocated in accordance with para 165 of the NPPF.

## A12 Teville Gate

### SA Site Criteria Summary

Opportunities: • The site is in a sustainable location within walking distance of Worthing train station. • It is a vacant brownfield site providing an opportunity for regeneration. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.

Constraints: • Potentially contaminated land. • The site has a high chance of surface water and groundwater flooding. • Development could potentially result in the loss of employment space. • The site is in the most deprived area of Worthing.

3.180 This site was included in the Draft Local Plan as allocation A5 Teville Gate with an indicative capacity of a mixed use scheme with 300 residential units. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

A5 Teville Gate								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	+	0	+	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	+	++	0	0	++	+	+

3.181 In preparing the Submission Draft Local Plan the indicative capacity was reduced to

250 dwellings (from 300). This reflects an alternative scheme currently being advanced. No reasonable alternatives were identified since the previous permitted schemes involving the higher figure were not deliverable due to the viability implications of very tall buildings.

- 3.182 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by developing a SuDS scheme, protecting and enhancing heritage assets and their settings and to maximise positive effects by providing pedestrian and cycle routes from the station to the town centre and Morrisons.

The results of its appraisal are copied below:

A12 - Teville Gate								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	-	0	++	-
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	+	?	?	+	+	+

- 3.183 Objective 5 Water Management now scores as having negative effects as the SFRA identified part of the site is at a high risk of surface water flooding. Objective 8 Historic Environment also scored negatively highlighting the potential risk to nearby heritage assets. Mitigation has been proposed to minimise these negative effects and maximise positive effects.

- 3.184 In line with the NPPF the Exception Test was applied. This appraisal demonstrates that development would provide wider sustainability benefits to the community that outweigh the flood risk and therefore part a) of the Test is passed. Part b) of the Test is set out in the Flood Risk Sequential and Exception Test that accompanied the Submission Draft Local Plan and uses information from the Level 2 SFRA. Therefore both elements of the Exception Test have been satisfied and development can be allocated in accordance with para 165 of the NPPF.

### A13 Titnore Lane

SA Site Criteria Summary
<p>Opportunities: • The site is in a sustainable location within walking distance of Durrington train station. • It is a brownfield site providing an opportunity for regeneration. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.</p>

Constraints: • Potentially contaminated land. • High chance of surface water flooding and records of historic flooding. • Development could potentially result in the loss of employment space

3.185 The Landscape and Ecology Study Addendum 2017 and Combined Summary 2017 assessed and concluded that Land East of Titnore Lane had in landscape and landscape, visual and ecology terms for limited development proposals which would 'round off' a settlement or develop infill sites, but would need to demonstrate no adverse impacts on the setting to the National Park, the wider landscape or important landscape features such as woodland, and should have regard for the setting and form of existing settlement and the character and sensitivity of the adjacent landscapes.

3.186 A proposed housing layout incorporating 126 dwellings was put forward by the land owner. However it was advised by the Council's Landscape consultant that:

*'the scheme proposed would compromise the integrity of the internal woodland and hedgerow, and potentially reduce the screening potential of the roadside hedgerows. Any proposals should respect current Natural England standing advice with regard to ancient woodland. A less intensive land use than proposed may provide a more acceptable solution to the development of the site'*

3.187 Therefore the site was included in the Draft Local Plan as an omission site OS1 Land east of Titnore Lane as at that stage it had not been demonstrated that development would not result in the loss or deterioration of ancient woodland (an irreplaceable habitat) or a negative impact on the Local Wildlife Site, and further evidence was required to demonstrate that a safe and suitable access was achievable from Titnore Lane.

3.188 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

OS1 Land east of Titnore Lane								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	-	-	-	?	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	?	0	0	0	0	?

3.189 In response to the Draft Local Plan consultation an alternative site layout was proposed by the land owner in 2020. This incorporated 73 homes and a 20m buffer to Ancient Woodland. The Council's Landscape consultant advised that

*'In considering the overall effects of the revised Framework Plan on the landscape and ecological resource the revised plan provides an acceptable basis for the future development of the site.'*

3.190 Therefore the Submission Draft Local Plan has included the site as an allocation as it was considered that the previously identified constraints could be overcome. No reasonable alternatives for development options were identified as capacity has been largely determined by ecological constraints.

3.191 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by ensuring the protection of Ancient Woodland with buffers, delivering a SuDS scheme, and maintaining and enhancing visual screening from the National Park, as well as, improving walking links and access to the National Park to maximise positive effects.

The results of its appraisal are copied below:

A13 - Titnore Lane								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	--	--	-	-	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	?	?	0	0	+

3.192 As expected by now including this site as an allocation there are more positive scores against the Sustainability Objectives, particularly Objective 11 Housing. Very negative effects are now scored against Objectives 2 Biodiversity and 3 Land and Soils reflecting the sensitive ecological constraints in and around the site and the potential loss of arable land.

#### A14 Union Place

SA Site Criteria Summary
<p>Opportunities: • The site is in a sustainable location within walking distance of Worthing train station. • It is a vacant brownfield site providing an opportunity for regeneration. • It is located in the Town Centre. • The site is in Flood Zone 1. • Located within the Built Up Area Boundary.</p> <p>Constraints: • Potentially contaminated land</p>

3.193 This site was included in the Draft Local Plan as allocation A6 Union Place with an indicative capacity of 128 residential units, 2,390 sqm commercial and 3,088 sqm leisure. The Worthing Retail & Town Centre Uses Study (2017) concluded that



sequentially this site (along with 2 others) should form the priority for new/additional floorspace. It recognises that this is the largest development opportunity in Worthing town centre, and is well integrated with the primary shopping area and provides an excellent opportunity to meet the identified retail and leisure needs. The importance of this site in delivering town centre uses and lack of alternative options meant a solely residential scheme on this site was not considered as a reasonable alternative. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

A6 Union Place								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	-	+	0	++	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	0	0	++	++	?

3.194 In preparing the Submission Draft Local Plan the indicative capacity was amended to increase the number of dwellings to 150 (from 128) and decrease the amount of commercial and leisure floorspace to 700 sqm to better reflect the submitted planning application AWD/0461/20 which proposes 186 dwellings, whilst still ensuring the policy sets a realistic minimum requirement. The requirements for Plans to be positively prepared and make sufficient provision for housing means that where capacity of a site can be increased (and reduce the shortfall in meeting local housing needs), there are no reasonable alternatives.

3.195 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by developing a SuDS scheme and protecting and enhancing nearby heritage assets.

The results of its appraisal are copied below:

A14 - Union Place								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	++	-	-	0	++	-
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	+	+	?	?	+	++	/

3.196 Objective 10 Crime and Public Safety now scores as having a positive effect recognising the benefits of regenerating a vacant town centre site in terms of improving natural surveillance. Objective 5 Water Management now scores as having a negative effect as the SFRA identifies a portion of the site is at a medium risk of surface water and groundwater flooding. Objective 8 Historic Environment now

scores as having a negative effect recognising the potential risk to nearby heritage assets. Mitigation has been proposed to minimise these negative effects and maximise positive effects.

## A15 Upper Brighton Road

### SA Site Criteria Summary

Opportunities: • The site is in Flood Zone 1.

Constraints: • In close proximity to the AQMA. • Within Source Protection Zone 1. • High risk of groundwater flooding. • The northern part of the site is visible from the SDNP and considered to form part of its undeveloped setting

- 3.197 The site was assessed through the 2015 Landscape and Ecology Study which concluded that in landscape and ecology terms the site can be viewed as two parcels of land divided by Upper Brighton Road:
- Land to the south of the road (3A) has a medium suitability for development for proposals which would 'round off' a settlement or develop infill sites, but would need to demonstrate no adverse impacts on the setting to the National Park or the wider landscape, and should have regard for the setting and form of existing settlement and the character and sensitivity of the adjacent landscapes.
  - Land to the north of the road (3B) has a low suitability for development. Development in these areas would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between settlements, the setting to existing settlement or the South Downs National Park.
- 3.198 The site was further assessed in landscape and ecology terms through the Review of Low Suitability Sites 2017 which re-assessed parcel 3B and resulted in it being amended to having medium suitability.
- 3.199 This site was included in the Draft Local Plan as an allocation A3 Upper Brighton Road with an indicative capacity of 123 residential units consisting of 105 units on parcel A and 18 units on parcel B. The developable area is limited by the cabling and easement strip to serve Rampion offshore windfarm, with the land to the east (including the easement strip) being designated as Local Green Gap. The presence of this easement strip meant no reasonable alternatives to this were identified.
- 3.200 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

A3 Upper Brighton Road								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.

Score	-	-	--	-	0	-	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	++	0	0	0	0	+

3.201 Responding to representations received to the Draft Local Plan, officers accepted that wording relating to landscape and heritage assets needed to be strengthened and the extent of the easement strip / boundary to the Gap clarified.

3.202 In preparing the Submission Draft Local Plan no alternative options were identified or changes made to the indicative capacity of this site. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise negative effects by incorporating measures in line with the Air Quality Action Plan, enhancing biodiversity features to achieve net gains, developing a SuDS scheme, avoiding coalescence and reducing visual impacts from the National Park, protecting and enhancing the setting of nearby heritage assets. Mitigation to maximise positive effects was also identified by improving walking links and access to the National Park and pedestrian and cycle routes along Upper Brighton Road.

The results of its appraisal are copied below:

A15 - Upper Brighton Road								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	-	-	--	-	-	-	0	-
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	?	?	0	0	+

3.203 Compared with the previous appraisal scoring against Objective 5 Water Management and Objective 8 Historic Environment is now showing as having a negative effect as the SFRA identifies part of the site as being at a high risk of groundwater flooding and due to the potential effects on nearby heritage assets. Scoring against Objective 9 Healthy Lifestyles is now a positive effect due to the opportunities to improve access (given the site's proximity) to the National Park.

3.204 In line with the NPPF the Exception Test was applied. This appraisal demonstrates that development would provide wider sustainability benefits to the community that outweigh the flood risk and therefore part a) of the Test is passed. Part b) of the Test is set out in the Flood Risk Sequential and Exception Test that accompanied the Submission Draft Local Plan and uses information from the Level 2 SFRA. Therefore both elements of the Exception Test have been satisfied and development can be allocated in accordance with para 165 of the NPPF.

## Development Management Policies

### Whole Plan Viability Assessment (2021)

- 3.205 A number of the Council's proposed policies have an impact on development viability, both directly and indirectly. The following key policy areas were tested to ascertain whether and to what degree those policies and potential future s106 planning obligations could be absorbed by development whilst maintaining development viability (and therefore viability of the Plan overall). Nationally Described Space Standards (Policy DM2) Open Space requirements (Policy DM7) Enhanced accessibility 'Access to and use of Buildings' (Policy DM1) Water Efficiency Standards (Policy DM16) Sustainable Design & Construction (Policy DM16).
- 3.206 The assessment indicated that the provision of Affordable Housing is the most costly policy to support but 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.

### DM1 Housing mix

- 3.207 The SHMA and Housing Implementation Strategy sets out the evidence to demonstrate that Worthing has a high proportion of older residents and those with mobility restrictions. The NPPF expects Local Plans to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing. These include accessibility requirements. Therefore the following options were identified and tested in the DIIA (Appendix F)

Option 1: Require developments to meet the optional higher Building Regulations standard M4(2) for Accessible and Adaptable dwellings where feasible and viable and for 10% of homes on major developments to meet Building Regulations requirement M4(3) wheelchair user dwellings.

This option scores very positively in terms of the benefits to the health and wellbeing of individuals and communities by enabling people to remain in their homes for longer and improving the quality and choice of housing available to those with additional mobility issues and those requiring housing accessible for wheelchair users. However there are a number of uncertain and neutral scores which recognise the potential that this may conflict with site constraints and the potential impact on viability.

Option 2: Expect Applications to comply with the optional higher standard M4(2) only.

This option scores positively in terms of the benefits to the health and wellbeing of individuals and communities by enabling people to remain in their homes for longer this would particularly affect older people although would also support those with mobility issues. However the scoring also recognises the potential impact on viability and consequently housing delivery due to increased build costs.

Option 3: Continue to rely on current Building Regulations standards.

This option scores fairly neutral compared with the baseline however in the longer term this may place greater demand for specialist housing as the population ages if existing homes cannot be adapted.

Option 1 scores most positively due to the benefits for the community and health and wellbeing of the widest range of individuals. Although it is recognised that this may increase the cost of building homes, this is outweighed by the social benefits.

3.208 People aged over 65 represent 22.8% of the local population across Adur & Worthing and numbers are expected to grow significantly. Numbers of people aged over 65 are projected to increase by 10,700 (43%) in Worthing between 2016-36. Linked particularly to a growing older population, the number of people with health problems and/or disabilities are projected to increase significantly. In addition, it is forecast that the number of older people with dementia in Worthing is likely to increase by 54% from 2019 to 2036 and those with mobility problems are projected to rise by 49% over the same period.

3.209 Therefore Policy CP1 in the Draft Local Plan followed option 1 in the above table. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP1: Housing Mix & Quality								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	?	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	+	0	0	0	0

3.210 Following consultation on the Draft Local Plan it was recognised that further work would need to be undertaken to better understand up-to-date housing needs - particularly how best the needs of an aging population will be met. The SHMA 2020 included recommendations on accessibility standards, older peoples housing and the approach to housing mix.

3.211 In preparing the Submission Draft version of the Plan, the Policy was updated in response to these recommendations. In particular the approach to accessibility requirements was amended to follow option 2 in the above table, whilst some reference was retained in Policy DM3 Affordable Housing to the provision of affordable housing constructed to M4(3) where there is an identified need.

3.212 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM1 - Housing Mix

SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	?	0	0	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	+	0	0	0	0

As can be seen the changes to the Policy did not affect the appraisal scoring.

## DM2 Density

3.213 In March 2015, the Government published nationally described space standards that replace the existing different standards used by local authorities. The nationally described technical housing standards, provide the nationally recognised standard for bedrooms, storage and internal areas in new dwellings across all tenures. As a result the option of requiring new dwellings to meet these space standards was identified and tested in the DIIA (Appendix F).

Option 1: Require new dwellings to meet the minimum nationally described space standards

This option brings the most positive benefits in terms of people's health and wellbeing, and communities. However it is also recognised that there may be a risk in terms of viability that could impact delivery of smaller sites and affordable housing.

Option 2: Not setting minimum space standards

This option scores negatively as without minimum space standards homes may not always be a sufficient size to support health and wellbeing. This is likely to specifically impact those on lower incomes exacerbating health inequalities. However this option does score positive in so far as it is recognised that on some sites not having minimum space standards may enable additional dwellings to be delivered.

Subject to viability testing, Option 1 was found to score more positively due to its impact in terms of reducing health inequalities and helping to support stable communities.

3.214 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP2: Density								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	/	0	0	0	+	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	0	0	0	0	+

3.215 Following consultation on the Draft Local Plan, it was recognised that further work should be undertaken to identify opportunities to increase the density of new development. As a result of this in preparing the Submission Draft version of this Policy wording was strengthened with respect to making the most efficient use of land and minimum density requirements. However, as there is no change to the aim or intention of the policy this change is not likely to have significant effects.

3.216 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified that the policy wording should refer to consideration that needs to be given to important landscapes and heritage assets when determining the appropriate density for a site. The results of its appraisal are copied below:

DM2 - Density								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	++	0	0	?	+	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	0	0	0	+	+

3.217 The changes made to the Policy meant it scored more positively against Objective 3 Land and Soils which now has a score of very positive effect due to the strengthened wording relating to minimum densities, and Objective 15 Town and Local Centres which now has a positive effect recognising that higher densities should be achieved in these areas which will help support their vitality and vibrancy.

### DM3 Affordable housing

3.218 This policy was included in the Draft Local Plan as Policy CP3. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP3 Affordable Housing								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	0	0	0	0	0

3.219 The SHMA 2020 includes an updated assessment of affordable housing need which responds to the widened definition of affordable housing set out in the 2019 NPPF. The assessment shows an annual need for 418 rented affordable homes in Worthing. The SHMA has also assessed the potential scale of need for affordable home

ownership housing, identifying a need for 72 low cost home ownership homes per annum in Worthing. This results in a total net need for affordable housing of 490 p.a. In worthing from 2019-2036.

3.220 The Policy in the Submission Draft Local Plan has been updated to respond to this evidence, in particular it now proposes a differential rate for all major developments. In terms of the SA as there is no change to the aim or intention of the policy it is not likely to have significant effects so was not considered as an alternative. In addition as the affordable housing rate has been informed by the evidence and viability testing no reasonable alternatives have been identified.

3.221 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM3 - Affordable Housing								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	++	0	0	0	0	0

3.222 As the appraisal shows the changes to the policy have not altered the scoring against the objectives.

#### **DM4 Gypsy & traveller & travelling showpeople**

3.223 This policy was included in the Draft Local Plan as Policy CP4. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

DM4 Gypsy & traveller & travelling showpeople (formerly CP4 Gypsy & Travellers and Travelling Showpeople								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	/	0	0	0	+	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	/	0	+	/	0	0	0	+

3.224 The Coastal West Sussex Authorities Gypsy and Traveller Accommodation Assessment (GTAA) (April 2019) provides evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople in the Coastal West Sussex authorities during the period up to 2036. For Worthing this concluded that there is no need for any additional pitches or plots for Gypsies and Travellers or Travelling



Showpeople. Therefore no reasonable alternatives were identified or significant amendments made to this policy for the Submission Draft version of the Local Plan.

3.225 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM4 - Gypsy & traveller & travelling showpeople								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	0	0	0	+	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	/	0	+	/	0	0	0	+

3.226 The appraisal shows that there was no change in the scoring of the Draft and Submission Draft versions of the policy.

### DM5 Quality of the built environment

3.227 This policy was included in the Draft Local Plan as Policy CP5. To ensure the policy was consistent with national policy no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP5 Quality of the Built Environment								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	+	0	0	0	+	++	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	/	+	/	0	0	0	0	+

3.228 No significant amendments were made to this policy for the Submission Draft version of the Local Plan. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM5 - Quality of the built environment								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	+	0	0	0	+	++	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	/	+	+	0	0	0	0	+

- 3.229 This version of the policy scored more positively against Objective 1 Environmental Quality which changed from none to a positive effect recognising that the policy will help ensure lighting does not cause light pollution; Objective 8 Historic Environment which changed from an uncertain to positive effect as policy wording ensures that development respects, preserves and enhances heritage assets and their settings; and Objective 11 Housing which changed from a neutral to positive effect recognising that the policy will ensure new housing is well built.

## DM6 Public realm

- 3.230 This policy was included in the Draft Local Plan as Policy CP6. The need to be consistent with national policy and also consider the Council's Public Realm Strategy and Seafront Investment Plan meant no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP6 Public Realm								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	+	/
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	+	0	0	0	0	+	+

- 3.231 No significant amendments were made to this policy for the Submission Draft version of the Local Plan. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified that where the public realm is in close proximity to heritage assets it is important it relates to the local and historic context. The results of its appraisal are copied below:

DM6 - Public realm								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	+	+	/
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	+	0	0	0	?	++	+

- 3.232 This version of the policy scored positively against Objectives 6 Landscape and Character as the policy will enhance the character and distinctiveness of areas and Objective 9 Healthy Lifestyles recognising that a high quality public realm will help provide outdoor space. The policy has very positive effects against Objective 15 Town and Local Centres as an enhanced public realm in the town centre is identified in the policy and as an integral part of the strategic objectives for the town.

## DM7 Open space, recreation & leisure

3.233 This policy was included in the Draft Local Plan as Policy CP8. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP8 Open Space, Recreation and Leisure								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	+	0	0	?	+	+	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	++	?	-	+	0	0	0	+

3.234 The Sport Leisure Open Space Study 2019 concluded that the extent of the urban area and pressures for development mean that the protection of valued high quality open spaces and sport and recreation facilities is a key priority in Worthing and they should only be developed for alternative uses in exceptional circumstances. Additional key findings for additional need over the Plan period include: • Indoor swimming pools - 81.64 sqm extra waterspace by 2036 (68.98 sqm by 2028) • Sport Halls - 2+ courts by 2036 (1+ courts by 2028); • Adult football – 4 pitches; • Youth football 11v11 – 4 pitches; • Youth football 9v9 – 2 pitches; • Mini football – 3 pitches; • Cricket – 2 pitches in Adur & Worthing; • Rugby – 3 pitches in Adur & Worthing; • 3G FTPs – 2.5 pitches; There is a deficiency in at least one type of open space in every ward in the borough.

3.235 In considering the approach to open space, sport and recreation within the Worthing Local Plan, the requirements of the NPPF provide a key consideration. The recommendations contained within the Joint Sport, Leisure and Open Space Study informed the policy approach as set out within Policy DM7: Open Space, Recreation and Leisure as such no reasonable alternatives were identified.

3.236 The policy sets out that the starting point for schemes of 10+ dwellings will be to provide open space on site in accordance with the Council's adopted standards. Where it is not possible to provide open space on site, contributions will be sought to provide or improve open space off-site within the ward or nearby ward to which the development is located. It was considered appropriate to clarify the circumstances when the loss of open space, sport and recreation facilities may be considered acceptable. Regard was given to paragraph 97 of the NPPF in identifying such circumstances.

3.237 Taking account of national guidance and the local situation, a single policy is proposed in relation to the provision and retention of open space, sport and recreation facilities. No reasonable alternatives were identified.

3.238 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM7 - Open space, recreation & leisure								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	+	0	0	?	+	0	+
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	++	0	-	+	0	0	0	+

3.239 Despite a number of changes being made to this Policy the appraisal scores remain largely consistent apart from Objective 7 Built Environment changing from a positive score to no effect. This was a correction to the appraisal.

### **DM8 Planning for sustainable communities / community facilities**

3.240 This policy was included in the Draft Local Plan as Policy CP9. To ensure consistency with the NPPF no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP9 Planning for Sustainable Communities / Community Facilities								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	+	+	+	0	+

3.241 No significant amendments were made to this policy for the Submission Draft version of the Local Plan. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM8 - Planning for sustainable communities / community facilities								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	++	+	0	0	+

3.242 The policy scores more positively against Objective 12 Communities now having very

positive effects recognising that the policy will protect and support improvements to a range of community facilities. Whereas the score against Objective 14 Economy has changed from positive to no effect recognising that the types of facilities and services this policy is likely to support are unlikely to have a significant effect in terms of job creation.

### DM9 Delivering infrastructure

3.243 This policy was included in the Draft Local Plan as Policy CP10. To ensure consistency with the NPPF no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP10 Delivering Infrastructure								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	0	0	?	+	?	+	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	+	+	+	+	+	+

3.244 No significant amendments were made to this policy for the Submission Draft version of the Local Plan. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM9 - Delivering Infrastructure								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	0	0	?	+	0	0	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	+	+	+	+	0	+

3.245 The scores of both versions of the Policy are largely consistent. However the scores against Objective 7 Built Environment and Objective 15 Town and Local Centres have changed from a positive to no effect recognising the limited direct effect of this policy.

### DM10 Economic growth and skills

3.246 This policy was included in the Draft Local Plan as Policy CP11. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP11 Economic Growth and Skills								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	+	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	+	+	+	+	++	+	+

3.247 In response to the 2020 ELR Update there have been some updates to this policy for the Submission Draft version of the Local Plan such as new criterion to refer to the use of conditions. These changes have been informed by the evidence and therefore no reasonable alternatives have been identified.

3.248 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM10 - Economic growth and skills								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	+	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	?	-	+	+	++	+	+

3.249 The Submission Draft version of the policy scores slightly less positively than the Draft Local Plan version due to the Scoring against Objectives 9 Healthy Lifestyles, 10 Crime and Public Safety and 11 Housing, changing from a positive effect. The negative score against Objective 11 is due to the recognition that given the lack of available land the provision of new employment floorspace is likely to be at the expense of housing delivery.

### **DM11 Protecting and enhancing employment sites**

3.250 The 2016 ELR recommended a number of options (not mutually exclusive) to accommodate a positive floorspace requirement for both office and industrial uses:

- I. adopting a stricter approach to determining planning proposals seeking change of use and/or the loss of employment floorspace;
- II. encouraging the upgrading and refurbishment of existing employment areas;
- III. considering allocating additional sites for office and industrial development purposes;
- IV. to not specifically identify additional capacity for employment space, but by implication, assume that some requirements are met on non-allocated sites or could be displaced to adjoining local authorities that fall within the Borough's functional economic market area.

- 3.251 The Issues and Options consultation document proposed the option of whether the Local Plan should continue to protect key employment areas or if it should be more flexible in its approach. This was further developed and tested through the SA within the DIIA (Appendix F):

Option 1: Protect key industrial estates, business parks and office locations.  
Option 2: Avoid the long term protection of employment sites allowing a more flexible approach.

Option 1 would support local economic growth bringing very positive effects for the local economy. The safeguarding of local jobs also brings positive effects for local communities and may contribute to a reduction in health inequalities as well as supporting the town and local centres. However it is recognised that protecting employment sites may negatively impact housing delivery. In addition the appraisal has highlighted negative effects should employment uses on a site become redundant resulting in vacant properties.

Option 2 scores positively in terms of enabling a more flexible approach to uses which may help ensure a more effective use of land. However it scores very negatively due to the potential loss of employment space to non employment uses, reducing employment opportunities within the Plan area. This consequently also scores negatively due to the potential loss of jobs which may increase local unemployment and exacerbate health inequalities.

Based on this Option 1 was selected as the preferred option for the Local Plan. However, to mitigate the potential negative effects resulting from vacant properties, it was recommended that wording should be included in the policy to allow the release of those sites that are genuinely redundant or vacant for long periods. In addition consideration should be given to the use of Article 4 Directions to ensure this policy is effective given the scale of loss of employment floorspace as a result of Permitted Development Rights.

- 3.252 This policy was included in the Draft Local Plan as Policy CP12. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP12 Protecting and Enhancing Existing Employment Sites								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	/	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	+	+	+

- 3.253 The 2020 ELR Focused Update found that in general, there would appear to be a reasonable basis for maintaining an employment land protection policy for key sites in the emerging Worthing Local Plan in line with the designations already set out in Policy CP12, which ensure that Worthing can retain its business base and sector strengths, particularly in view of the overall constraints to bringing forward additional employment land.

3.254 In response to the 2020 ELR Update there have been some updates to this policy for the Submission Draft version of the Local Plan such as the need to reflect the new use class E. These changes have been informed by the evidence and changes to national policy and therefore no reasonable alternatives have been identified.

3.255 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified to minimise the likelihood of vacant premises by allowing for some flexibility in the policy. The results of its appraisal are copied below:

DM11 - Protecting and enhancing employment sites								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	/	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	-	0	0	++	+	+

3.256 This version of the Policy now scores as having a negative effect against Objective 11 Housing and mitigation has been identified to minimise this. This policy has a very positive effect against Objective 14 Economy recognising that the policy approach will help protect a loss of floorspace to other uses and support the local economy through the provision of jobs.

## DM12 The visitor economy

3.257 This policy was included in the Draft Local Plan as Policy CP13. The policy approach supports wider corporate objectives and is consistent with the NPPF, therefore no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP13 The Visitor Economy								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	+	+	0

3.258 No significant amendments were made to this policy for the Submission Draft version of the Local Plan. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:



DM12 - The visitor economy								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	+	+	0

3.259 There are no changes in the appraisal scoring for these versions of the policy.

### DM13 Retail and town centre uses

3.260 The Worthing Retail and Town Centre Uses Study (2017) aims to understand the current health and performance of the borough's retail and leisure offer and sets out the additional convenience and comparison floorspace needed over the Plan period to 2033. It recommends that a high end, quality quarter for clothing and footwear should form a focus of activity somewhere within Character Area 7 (South Street) and/or Character Area 8 (Montague Street) and the Grafton site, and that connectivity between the seafront and shopping area should be prioritised. It identifies Warwick Street as a key character area that should be protected in policy as a café culture/restaurant destination with associated niche/independent retailing.

3.261 In terms of the current policy approach the study recommends a more flexible approach to the town centre by reducing the primary shopping area where only A1 retail uses are permitted. The options of increasing flexibility or retaining the existing policy approach were identified and appraised within the DIIA (Appendix F). These are set out below:

#### Option 1: Increase in flexibility

This option scores as having positive effects against social and economic objectives with no negative effects identified.

#### Option 2: Retain existing approach

This option scores as having neutral effects overall against social and economic objectives.

The preferred approach for the Local Plan was Option 1 as allowing greater flexibility scores more positively overall whilst still protecting the retail core of the town centre. It is therefore considered the most sustainable option for the Local Plan.

3.262 This policy was included in the Draft Local Plan as Policy CP14. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

#### CP14 Retail Policies

SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	+	0	+	++	+

3.263 Following the Draft Local Plan it was recognised that whilst the evidence put in place to support the draft Local Plan strongly supported the policy position established in CP14 it was accepted that this needed to be updated to reflect more recent changes in guidance, the retail market and wider aspirations for the town centre.

3.264 The Submission Draft version of this policy was updated to respond to recommendations in the Worthing Town Centre Retail Study Update (2020) and changes to national policy such as Use Class E.

3.265 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM13 - Retail & town centre uses								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	+	0	+	++	+

3.266 The changes to the Policy did not result in any difference in the appraisal scoring.

#### **DM14 Digital infrastructure**

3.267 This policy was included in the Draft Local Plan as Policy CP25. The policy approach supports wider corporate objectives and is consistent with the NPPF, therefore no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP25 Digital Infrastructure								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	+	0	0

3.268 No significant amendments were made to this policy for the Submission Draft version of the Local Plan. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM14 - Digital infrastructure								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	+	0	+	0	0

3.269 This version of the policy resulted in an additional likely positive effect against Objective 12 Communities recognising that the high quality digital infrastructure that this policy supports can help enhance the provision of and online access to community facilities and services.

#### **DM15 Sustainable transport & active travel**

3.270 The Worthing Local Plan Transport Assessment - August 2018 provides a transport evidence base which demonstrates the traffic implications of potential new land use development and identifies an associated package of transport improvements. This transport assessment demonstrated that the proposed Worthing Local Plan sites would not have any significant impact on the performance of the Strategic Road Network and a mitigation package was proposed. No options or reasonable alternatives for the Local Plan emerged from this study.

3.271 This policy was included in the Draft Local Plan as Policy CP24. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP24 Transport and Connectivity								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	?	0	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	0	0	0	+	++

3.272 The Worthing Local Plan Transport Assessment Addendum (2021) provided supplementary information to address points raised by Highways England in relation to the suitability of the traffic model, the impact upon the strategic road network and the mitigation strategy. This concludes that the land use development proposed as part of the Worthing Local Plan is, overall, relatively modest due to constraints

relating to the extent of the Borough, the existing urban area and environmental constraints in the north of the Borough. The mitigation strategy proposed is consistent with policy and would avoid potentially abortive and unnecessary works to the SRN.

3.273 The Submission Draft version of this policy has been updated to reflect the findings of the transport study and place greater emphasis on sustainable modes of transport. This has been informed by the evidence and no reasonable alternatives have been identified.

3.274 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM15 - Sustainable transport & active travel								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	0	0	+	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	+	0	+	0	+	+	++

3.275 This version of the policy scores more positively with the appraisal now finding likely positive effects against Objectives 1 Environmental Quality due to the policy ensuring new development contributes to the mitigation of air pollution particularly in the AQMA's; Objective 4 Energy as the policy supports the expansion and improvement of public transport services and requires development to incorporate facilities for electric vehicle charging points which will support the transition from diesel and petrol cars; Objective 10 Crime and Public Safety as the policy aims to create safer roads which will help improve public safety; Objective 12 Communities as the policy promotes development in sustainable locations with good access to community services; and Objective 14 Economy as the policy supports improvements to road cycle and public transport infrastructure which may help attract further inward investment.

## **DM16 Sustainable design**

3.276 The National Planning Policy Framework (NPPF) expects Plans to take a proactive approach to mitigating and adapting to climate change and any local requirement for a building's sustainability to be consistent with the government's zero carbon buildings policy and adopt nationally described standards.

3.277 National guidance states that where there is a clear local need, local plan policies can require new dwellings to meet the tighter Building Regulations optional requirement of 110 litres / person / day. During preparation of the Draft Local Plan Worthing, was located within a 'serious' water stressed' area which is the highest stress classification and indicates where the demand for water exceeds the amount

available. In addition the Arun & Western Streams Abstraction Licensing Strategy (2013) identified that in Worthing, there is a general presumption against the issuing of new consumptive groundwater licences from the chalk aquifer. As a result the option of requiring the tighter optional requirement was identified and appraised in the DIIA (Appendix F). This is set out below:

**Option 1a Require optional higher Building Regulations standard on water efficiency**

This option brings significant positive impacts in terms of the environment, climate change adaptation, communities and possibly the local economy. However it is acknowledged that there may be cost implications which could impact the delivery of housing particularly on smaller sites.

**Option 1b Rely on current standards**

Option 1b brings mostly neutral effects reflecting that there is no change from the baseline situation

Subject to viability testing, Option 1a: to set a higher optional standard for water efficiency brings more significant positive impacts.

- 3.278 National guidance enables Local Plans to set energy performance standards for housing that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes which is around 20% as set out in The Written Ministerial Statement of 25 March 2015. Therefore the option to set an energy performance standard for housing above Building Regulations was identified and appraised within the DIIA (Appendix F) as Option 2 under CP17. These are set out below:

**Option 2a. Require minimum sustainability standards**

This option brings positive effects in terms of energy in relation to climate change mitigation, health and communities due to the potential lower energy costs. However there are potential negative effects due to the impact on historic buildings and viability for smaller sites. Mitigation has been identified which should be incorporated within the Local Plan.

**Option 2b. Rely on current standards**

The option to rely on current standards brings mostly neutral effects reflecting that it presents no change to the baseline situation. Therefore comparatively it is likely to bring fewer benefits in terms of climate change mitigation but equally less potential to negatively impact on housing delivery due to viability.

Subject to the mitigation identified Option 2a is the most sustainable option.

- 3.279 The appraisal identified that as mitigation the policy should be informed by viability work to understand the potential impact on the delivery of smaller sites. It should also include allowances for historic buildings as some measures to reduce emissions may not be appropriate. The policy approach identified in option 2a was adopted and incorporated into Policy CP17 in the Draft Local Plan.

3.280 This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP17 Sustainable Design								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	++	+	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	+	0	0	0	0

3.281 Following the Draft Plan consultation the Climate Change Act 2008 was amended in 2019 and now commits the UK to bring all greenhouse gas emissions to net zero by 2050. The Government consulted on the Future Homes Standard (2019) and Adur & Worthing Councils' declared a Climate Emergency (July 2019) and committed towards becoming carbon neutral by 2030.

3.282 In response to these changes the policy wording for the Submission Draft Local Plan was strengthened to reflect the Council's Declaration and amended to ensure consistency with the emerging Future Homes Standard. Policy wording relating to water efficiency measures was moved to Policy DM21 as it was considered that this was a more appropriate location. However whilst the detailed requirements changed it was considered that there was no change to the aim / intention or approach of this policy. Therefore it was not necessary to appraise these changes as reasonable alternatives. The requirements set had also been tested and informed through viability work.

3.283 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM16 - Sustainable design								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	+	0	++	0	0	0	?
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	?	+	0	0	0	0

3.284 The appraisal scores between the two versions of the policy are broadly similar with the key change being the scores for Objective 2 Biodiversity and Objective 5 Water Management changing with the policy now scoring as having a positive effect against Objective 2 recognising the provision of green infrastructure but no effect against Objective 5 following the move of water efficiency measures to Policy DM21.

## DM17 Energy

3.285 This policy was included in the Draft Local Plan as Policy CP18. The policy approach is consistent with the NPPF and wider corporate and government priorities. As the West Sussex Sustainable Energy Study (2009) found no technical potential for wind energy generation in Worthing, no areas were allocated for wind energy development and no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP18 Energy								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	0	0	++	0	+	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	0	0	0

3.286 Following the Draft Plan consultation this policy was strengthened as proposals for the Worthing Heat Network progressed. However, as there was no change in the aim or intention of the Policy these changes were not identified as reasonable alternatives.

3.287 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified that the policy should ensure energy schemes do not cause an unacceptable impact on landscape character and that they mitigate any impacts on the environment or local amenity.

The results of its appraisal are copied below:

DM17 - Energy								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	/	0	0	++	0	/	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	0	0	0

3.288 The Submission Draft Local Plan version of this policy scores less positively than the Draft Local Plan version against Objectives 1 Environmental Quality and Objective 6 Landscape and Character which the policy now scores neutral against as for both objectives the policy wording seeks to ensure development does not cause an unacceptable impact but does not seek to improve or enhance the local environmental quality or landscape and character.

## DM18 Biodiversity

3.289 This policy was included in the Draft Local Plan as Policy CP19. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP19 Biodiversity								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	++	0	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	?	0	0	0	0	0	0	0

3.290 Following the Draft Plan consultation this Policy was strengthened in terms of biodiversity net gain requirements. This was informed and tested through the Viability Study and as such no reasonable alternatives were identified.

3.291 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM18 - Biodiversity								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	++	0	0	?	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	?	0	0	0	0	0	0	0

3.292 The appraisals show that the scoring of both versions of the policy is consistent with the additional uncertain score associated with the Submission Draft Local Plan version against Objective 5 Water Management recognising that the creation or enhancement of wetland habitats could provide Natural Flood Management.

### **DM19 Green infrastructure**

3.293 This policy was included in the Draft Local Plan as Policy CP20. The Policy was drafted to be consistent with national policy and the lack of an existing Green Infrastructure Strategy meant no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP20 Green Infrastructure								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.



Score	+	+	0	0	+	0	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	0	0	0	0	+

3.294 Following the Draft Plan consultation this policy wording was strengthened to protect and enhance tree canopy cover and reference was added to the Building with Nature Full Award. As there was no change to the intention or aim of the policy this was not tested as a reasonable alternative as it was not considered it would be sufficiently distinct.

3.295 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM19 - Green Infrastructure								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	+	0	0	+	0	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	0	0	0	0	+

3.296 The appraisals show that the scoring of both versions of the policy is consistent.

## **DM20 Flood risk and sustainable drainage**

3.297 This policy was included in the Draft Local Plan as Policy CP20. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP21 Flood Risk and Sustainable Drainage								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	+	+	0	0	++	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	0	0	0	0	0

3.298 Following consultation on the Draft Local Plan it was acknowledged that the Strategic Flood Risk Assessment (SFRA) needed updating to provide a Level 1 assessment and Level 2 assessment for those sites that require the Exceptions Test. The recommendations of this would inform the wording of this policy.

3.299 The Adur & Worthing SFRA (2020) provides flood risk evidence and long-term

strategy to support the management and planning of development, protect the environment and deliver infrastructure. It also supports the selection of site allocations in Local Plan reviews and provides information and guidance to be used in the preparation of Flood Risk Assessments in support of site-specific planning applications.

3.300 The policy wording was updated in response to the recommendations within the Level 1 SFRA and to reflect the latest guidance and best practice. As these changes were informed by the evidence no reasonable alternatives were identified.

3.301 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. Mitigation was identified that the policy should require the adequate treatment of water prior to discharge to protect and where possible improve water quality.

3.302 The results of its appraisal are copied below:

DM20 - Flood Risk and Sustainable Drainage								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	/	+	0	0	++	0	+	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	?	0	0	0	0

3.303 In comparison with the Draft Local Plan version of the policy, this version scored less positively against Objective 1 Environment Quality though mitigation was identified to maximise positive effects. In contrast this version scored more positively against Objective 7 Built Environment as the policy requires drainage schemes to promote an enhanced landscape or townscape and good quality public spaces.

## **DM21 Water quality and sustainable water use**

3.304 This policy was included in the Draft Local Plan as Policy CP22. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP22 Water Quality and Protection								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	++	+	0	0	+	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	0	0	0	0	0

3.305 Following consultation on the Draft Local Plan the policy wording was strengthened in terms of the requirements to deliver SuDS and to move the water efficiency measures previously located in Policy CP17 to within this policy. As these requirements were not new it is not considered that there is any change to the total effects of the Local Plan. The reasonable alternatives considered in relation to water efficiency are set out under Policy DM17 above.

3.306 This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM21 - Water quality and sustainable water use								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	++	+	0	0	++	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	+	0	0	0	0

3.307 This version of the Policy scores more positively against Objective 5 Water Management and Objective 12 Communities reflecting the positive effects associated with water efficiency measures.

## DM22 Pollution

3.308 This policy was included in the Draft Local Plan as Policy CP23. The policy approach is consistent with the NPPF, therefore no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP23 Pollution								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	++	+	++	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	0	0	0	0	0

3.309 No significant amendments were made to this policy for the Submission Draft version of the Local Plan. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM22 - Pollution								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.

Score	++	+	++	0	0	0	0	0
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	+	0	0	0	0	0	0	0

3.310 The scoring for both versions of this policy against the Objectives is consistent.

### DM23 Strategic approach to the historic environment

3.311 This policy was included in the Draft Local Plan as Policy CP15. to meet the requirements of the NPPF and follow Historic England guidance, as such no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

CP15 A Strategic Approach to the Historic Environment								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	+	+	++
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	?	+	0	0

3.312 No significant amendments were made to this policy for the Submission Draft version of the Local Plan. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

DM23 - A Strategic Approach to the Historic Environment								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	+	+	++
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	?	+	0	0

3.313 The appraisals show that the scoring of both versions of the policy is consistent.

### DM24 The historic environment

3.314 This policy was included in the Draft Local Plan as Policy CP15 to meet the requirements of the NPPF and follow Historic England guidance, as such no reasonable alternatives were identified. This policy was appraised as part of the total effects of the Draft Local Plan within the DIIA (Appendix F). The results of its appraisal are copied below:

<b>CP16 The Historic Environment</b>								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	+	+	++
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	0	0	0

3.315 Following the Draft Plan consultation this policy was restructured but no significant changes were made to its content. This policy was appraised as part of the total effects of the Local Plan in Appendix D of the SA Report. The results of its appraisal are copied below:

<b>DM24 - The Historic Environment</b>								
SA Objective	1.	2.	3.	4.	5.	6.	7.	8.
Score	0	0	0	0	0	+	+	++
SA Objective	9.	10.	11.	12.	13.	14.	15.	16.
Score	0	0	0	0	0	0	0	0

3.316 The appraisals show that the scoring of both versions of the policy is consistent.



# **WORTHING BOROUGH COUNCIL**

## **DRAFT INTEGRATED IMPACT ASSESSMENT   MAIN REPORT**

### **Sustainability Appraisal Report incorporating Habitat Regulations Assessment, Equalities Impact Assessment and Health Impact Assessment**

**Regulation 18**

**October 2018**



## **Draft Integrated Impact Assessment Report**

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## **Part 1: Introduction**

### **1.1 Background**

- 1.1.1 The Worthing Local Plan is being prepared by Worthing Borough Council. Once adopted it will set the planning framework for the part of the borough outside of the South Downs National Park over the next 15-20 years.
- 1.1.2 This Integrated Impact Assessment (IIA) has been produced to inform the Draft Worthing Local Plan and should be read alongside the Draft Worthing Local Plan, the Local Plan Sustainability Appraisal Scoping Report (March 2015) and other relevant evidence base studies.

### **1.2 Approach to Integrated Impact Assessment**

- 1.2.1 IIA is an approach that assesses the potential impacts of proposals (strategies, policies, programmes, projects, plans or other developments) on issues that previously may have been assessed separately in a single process.
- 1.2.2 IIA therefore covers more than one type of impact assessment in a single process. This can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations.
- 1.2.3 The IIA fulfils the statutory requirements to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) as well as an Equalities Impact Assessment (EqIA), and although there is no statutory obligation, a Health Impact Assessment (HIA). In addition a Habitat Regulations Assessment (HRA) Screening has been undertaken of the potential effects of the Local Plan on the Natura 2000 network to determine whether the Local Plan will either alone or in combination with other relevant projects and plans, be likely to result in a significant adverse effect upon European protected sites and therefore whether an Appropriate Assessment is required. This can be found in Appendix E.
- 1.2.4 Each of these is discussed in turn below.

### **Sustainability Appraisal and Strategic Environmental Assessment**

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

- 1.2.6 The purpose of the SA is to promote sustainable development by integrating sustainability considerations into Local Plans. The SA aims to make a Local Plan more sustainable and more responsive to its environmental effects, by identifying the Local Plan's significant impacts and ways of minimising its negative effects.
- 1.2.7 The SEA/SA 'tells the story' of the Local Plan making process. It documents how planning decisions have been made, and how they have been informed by environmental and sustainability concerns.
- 1.2.8 The SEA Directive provides a means of ensuring that due consideration has been given to environmental issues during the preparation and adoption of strategic level plans. The SEA Directive and Regulations state that the SEA must consider the following topic areas:
- Biodiversity
  - Population
  - Human Health
  - Fauna
  - Flora
  - Soil
  - Water
  - Air
  - Climatic Factors
  - Material Assets
  - Cultural heritage, including archaeological and built heritage
  - Landscape
- 1.2.9 In line with the national Planning Practice Guidance (NPPG), the SA should meet all the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, which implements the EU Strategic Environmental Assessment (SEA) Directive (Directive 2001/42/EC).
- 1.2.10 SA is an iterative process undertaken during the preparation of a Local Plan. The process is an opportunity to consider options by which the Local Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. SA's are intended to inform the decision making process and to provide a mechanism of reviewing alternative options, not to make decisions on policy development.
- 1.2.11 The SA process has five main stages (A-E) based on legal requirements. The SA process works in parallel with the preparation of the Local Plan and links across at all stages. A simplified version of the SA methodology is illustrated in Figure 1.

1.2.12 Stage C is the preparation of the SEA/SA report. The SA is intended to inform the decision making process and to provide a mechanism of reviewing alternative options and evaluating likely effects. This draft report is the main product of the Plan appraisal process up to this point.

### **Health Impact Assessment**

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

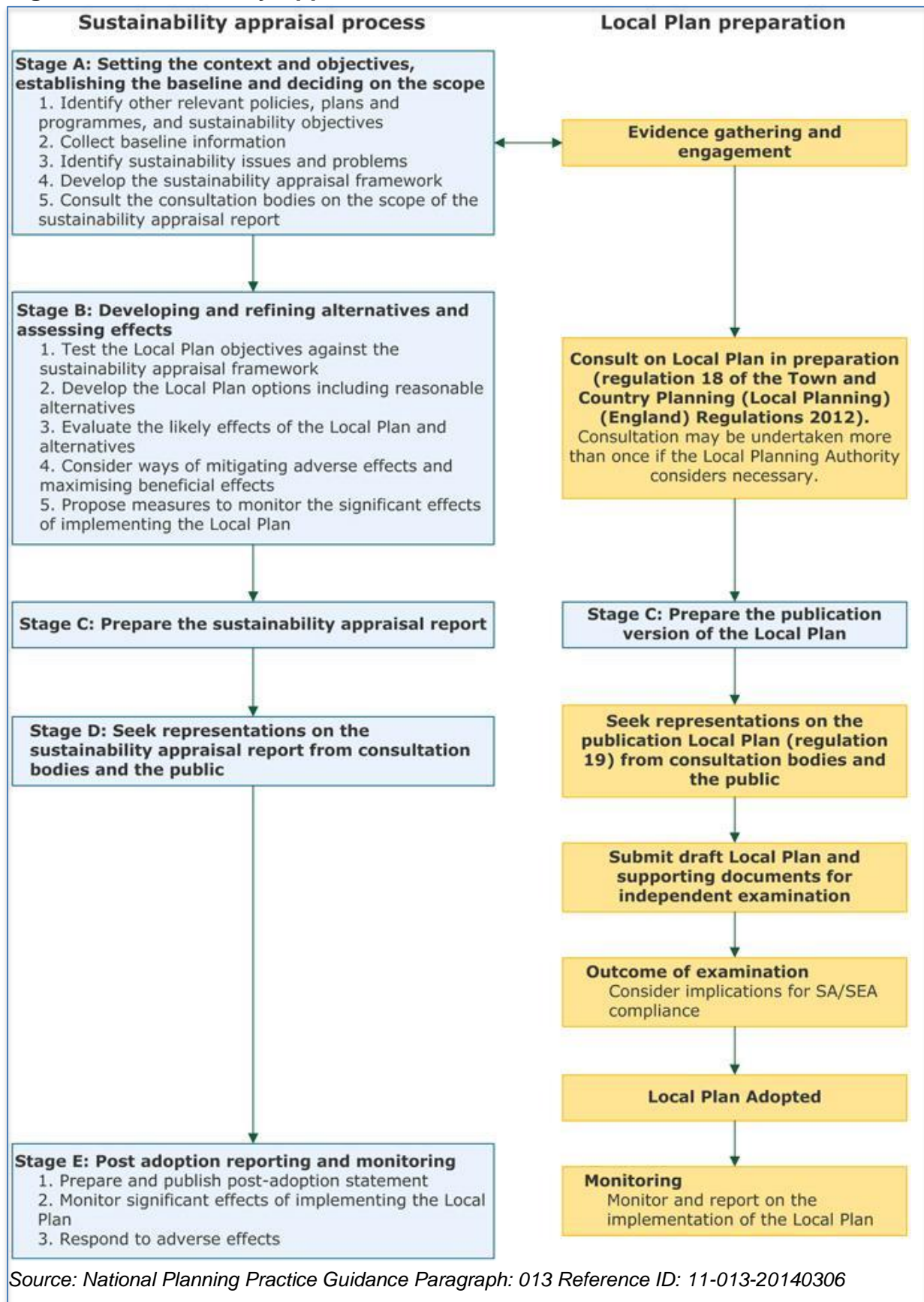
1.2.14 A HIA is intended to help make decisions by predicting the health consequences if a proposal were to be implemented. In addition to assessing the health consequences it also produces recommendations as to how the good consequences for health could be enhanced and how the bad consequences could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

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

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

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

**Figure 1: Sustainability Appraisal Process**



## Equalities Impact Assessment

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

1.2.19 Adur and Worthing Councils use Equalities Impact Assessment (EqIA), where appropriate, in order to improve the work of the Councils. The purpose of the EqIA is to improve the work of the Councils by making sure it does not discriminate and that, where possible, it promotes equality. It is a way of considering the likely effects of policies and decisions on different groups living and working in Worthing that are protected from discrimination by the Equality Act. The Equality Act protects people from discrimination on the basis of certain characteristics. These are known as protected characteristics of which there are nine:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

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

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

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

### 1.3 The structure of this Report

1.3.1 In line with the SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004), this Report must essentially answer four questions:

1. What’s the scope of the SA?
2. What has Plan-making / SA involved up to this point?
3. What are the appraisal findings at this current stage?
4. What happens next?

1.3.2 These questions are derived from Schedule 2 of the Regulations, which present the ‘information to be provided within the report. Table 1 explains the links between these and the regulatory requirements.

**Table 1: Questions that must be answered by the SA Report to meet Regulatory Requirements**

SA REPORT QUESTION		IN LINE WITH SCHEDULE II OF THE SEA REGULATIONS, THE REPORT MUST INCLUDE...
What’s the scope of the SA?	What’s the Local Plan seeking to achieve?	An outline of the objectives of the Local Plan and relationship with other relevant plans and programmes.
	What’s the sustainability ‘context’?	
	What’s the sustainability ‘baseline’?	

SA REPORT QUESTION		IN LINE WITH SCHEDULE II OF THE SEA REGULATIONS, THE REPORT MUST INCLUDE...
	What are the key issues & objectives that should be a focus?	Problems / issues / objectives that should be a focus of appraisal
	<b>What has Plan-making / SA involved up to this point?</b>	<p>Outline reasons for selecting the alternatives dealt with (and thus an explanation of 'reasonableness')</p> <p>The likely significant effects associated with alternatives</p> <p>Outline reasons for selecting the preferred approach in-light of alternatives appraisal / a description of how environmental objectives and considerations are reflected in the Local Plan</p>
	<b>What are the appraisal findings at this current stage?</b>	<p>The likely significant effects associated with the draft Local Plan</p> <p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of the Local Plan</p>
	<b>What happens next?</b>	A description of the monitoring measures envisaged

*N.B. The right-hand column of Table 1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix A** of this report.*

1.3.3 This document is the Draft IIA Report of the Draft Worthing Local Plan (2018), and hence needs to answer all four of the questions listed above with a view to providing the information required by the Regulations. Each of the four questions are answered in turn, below.



## Part 2: What is the Scope of the Sustainability Appraisal?

### 2.1 Introduction

2.1.1 The aim of Part 2 of this Report is to introduce the scope of the SA. In particular, and as required by the Regulations (Environmental Assessment of Plans and Programmes Regulations 2004), this part of the Report answers the following questions:

- What's the Local Plan seeking to achieve?
- What's the sustainability context?
- What's the sustainability baseline?
- What are the key issues and objectives that should be a focus of the SA?

2.1.2 The Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are Natural England, The Environment Agency and Historic England. In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'. These bodies along with other stakeholders in relation to Equalities Impact Assessment and Health Impact Assessment were consulted on the SA Scoping Report for the statutory five week consultation period from Monday 16 March to Monday 20 April 2015.

2.1.3 The Scoping Report set out the methodology and framework for the SA of the Local Plan. The aim of this was to obtain comment and feedback on the scope and level of detail of the SA. Appendix B sets out the responses received and how they were addressed. The responses received resulted in the SA Framework and methodology being refined. The consultation bodies were consequently reconsulted on the revised framework and methodology from 7 March to 15 April 2016. The full SA Scoping Report was published on the Council's website during the 'Your Town, Your Future' 2016 Local Plan consultation between 11 May and 22 June 2016.

2.1.4 The Scoping Report provides an agreed 'basis' for appraisal; however it is important to note that the 'scope' for the appraisal is unlikely to remain static given that the understanding of sustainability problems/issues/objectives inevitably evolve over time and situations change.



## 2.2 What is the Plan seeking to achieve?

The SA Report must include:

- Outline the main objectives of the plan and relationship with other relevant plans and programmes.

2.2.1 The Draft Local Plan provides the broad policy framework and a long-term strategy to manage development, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities within Worthing.

2.2.2 Once the spatial strategy has been established, the Local Plan must then make clear what development is intended to happen over the life of the Plan until 2033, where and when this will occur and how it will be delivered. This is done by establishing and designating key developments sites and specific allocations of land for different purposes. Criteria-based policies are also used to guide and help consider development proposals. An associated Policies Map is used to illustrate geographically how the adopted policies will be applied.

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

2.2.4 The new Local Plan will cover most of Worthing borough. However, unlike the existing Core Strategy, it will not cover the land in the north of the borough that lies within the South Downs National Park. The South Downs National Park Authority is producing a Local Plan which will set planning policy for the South Downs National Park boundary as whole.

### How does the Local Plan relate to other plans?

2.2.5 The Local Plan must be aligned with and conform to a number of other influences including national policy and local strategies. Key documents include:

- The Plan must encompass the requirements of the Government's Revised National Planning Policy Framework (NPPF) (2018), and supporting PPG.
- Regard has to be given to the Marine Policy Statement and the associated adopted South Marine Plan (2018) which provide the framework for decisions affecting the marine environment.

- The Coastal West Sussex and Greater Brighton Local Strategic Statements (2016), produced by the Coastal West Sussex authorities including Brighton & Hove, sets out the long term strategic objectives and spatial priorities for the coastal authorities to be addressed through a coordinated approach across the area in terms of planning and investment.
- Adur & Worthing Growth Deal 2017-2022 signed by Worthing Borough Council and West Sussex County Council which sets a number of priority projects that both Councils are committed to delivering in partnership.
- Worthing Town Centre Investment Prospectus sets out a broad vision for the town centre and set out an ambition for Worthing to “be recognised as a highly desirable place to live, work and visit.
- Worthing Seafront Investment Plan 2017 provides a clear focus on securing investment to deliver an ambitious vision and series of transformational projects designed to complement and enhance the regeneration of the town centre and support delivery of key sites set out in the Investment Prospectus. The Seafront Investment Plan also takes into account early design proposals emerging from the Worthing Public Realm Options Appraisal Study (2017).

## Local Plan Vision and Objectives

2.2.6 The Vision for the Draft Local Plan sets out what kind of town Worthing aspires to be by 2033. It responds to local challenges and opportunities, is evidence based and takes account of community derived objectives.

- V1. By 2033 Worthing will be recognised as a highly desirable place to live, work and visit, continuing to attract high calibre businesses and significant inward investment that will help the town’s economy to grow and improve its regional competitiveness.
- V2. Regeneration of the town centre and seafront will have built on recent successes to unlock key development sites and deliver a vibrant and diverse retail, cultural and leisure offer for residents and visitors of all ages.
- V3. Limited land resources will have been developed in the most efficient way to maximise the delivery of the widest range of identified needs, whilst at the same time ensuring that the Borough’s environment, intrinsic character and its coastal and countryside setting have been protected and enhanced.
- V4. High quality new development will have been integrated with existing communities and opportunities taken to deliver new and improved facilities and services.

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

**SOCIAL** - The Local Plan will:

SO1 Deliver high quality new homes that best reflect the identified needs within the borough (in terms of size, type and tenure).

SO2 Ensure that developments provide an appropriate level of affordable housing to help those in housing need.

SO3 Improve accessibility to services, local centres and the town by sustainable modes of transport, reducing the need to travel by car.

SO4 Ensure that there is sufficient infrastructure capacity to meet existing needs and the needs arising from new development.

SO5 Safeguard existing dwellings and the character and amenity of residential areas.

SO6 Ensure new development integrates into existing communities, supporting local centres to enhance well-being of all people, and reduce inequalities.

SO7 Encourage the creation of healthy environments, improve opportunities to access the natural environment and support healthy and active lifestyles.

**ECONOMY** - The Local Plan will:

SO8 Retain and enhance key employment areas and provide a choice of employment sites to meet the needs of existing and future businesses.

SO9 Strengthen Worthing's town centre as a location for shopping and business and enhance its role as a sub-regional centre.

SO10 Encourage family friendly and evening economies and improve the retail, cultural and leisure offer in the town centre through the improvement of existing areas, the delivery of new developments and improved connectivity.

SO11 Enhance the gateway approaches and key transport corridors leading into the town centre.

SO12 Support Worthing's tourism role through the provision of additional high quality tourism facilities.

SO13 Deliver high quality public realm and enhanced infrastructure to attract inward investment.

SO14 Seek to improve the skills of the workforce and quality of the environment to encourage the creation of high value jobs by existing and new businesses.

**ENVIRONMENT** - The Local Plan will:

SO15 Protect, and where possible enhance, valued green spaces, stretches of undeveloped coastline and the quality of the natural environment.

SO16 Improve the quality of the natural environment and public realm within the town centre and along the seafront.

SO17 Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.

SO18 Protect, maintain and enhance the distinct character, heritage, identity and setting of the borough.

SO19 Ensure development mitigates the impact of, and helps the borough to adapt to, the effects of climate change, now and in the future.

SO20 Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion and promote active travel.

**What is the Local Plan not trying to achieve?**

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

2.2.9 It is important to emphasise that the Plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking i.e. a process that omits consideration of detailed issues in the knowledge that these can be addressed further down the line through the planning application process. The strategic nature of the Plan is reflected in the scope of the SA.

## 2.3 What is the sustainability context?

The SA Report must include:

- Relevant sustainability objectives, established at international / national level; and
- Existing sustainability problems / issues which are relevant to the Plan including, in particular, those relating to any areas / populations etc. of particular importance.

2.3.1 An important step when seeking to establish the appropriate scope of an SA involves reviewing context messages in relation to broad problems / issues and objectives. The Local Plan SA Scoping Report (2015) presented a full review of the relevant Plans, Policies, Programmes, Strategies and Initiatives (PPPSIs) and identified key messages. An updated summary of key context messages is presented below.

### Environmental Context

2.3.2 To limit air pollution, the EU adopted the Clean Air Policy Package which includes a Clean Air Programme for Europe which sets new objectives for air policy for 2020 and 2030. This is achieved through Directive 2016/2284/EU on the reduction of national emissions of certain atmospheric pollutants which sets national reduction commitments for five pollutants. Nationally, the Air Quality Plan for Nitrogen Dioxide in UK (2017) sets out how the UK will be reducing roadside nitrogen dioxide concentrations. The 25 Year Environment Plan (2018) sets out goals and targets to achieve clean air through reducing emissions, ending the sale of petrol and diesel cars and vans, and maintaining continuous improvement in industrial emissions. The revised NPPF suggests that planning policies should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs), and the cumulative impacts from individual sites. Opportunities to improve air quality should be identified and considered at the plan-making stage. The Environment Act 1995 and the Air Quality Regulations as amended (2002) require Local Authorities to assess air quality and where necessary declare AQMAs and produce Air Quality Action Plans. The Worthing Air Quality Action Plan (2015) details necessary steps to improve air quality within the identified AQMA. The Sussex Air Quality and Emissions Mitigation Guidance (2013) was developed by members of the Sussex Air Quality Partnership (Sussex-air). The guidance supports the principles of the partnership to improve air quality across Sussex and encourage emissions reductions to improve the environment and health of the population. Breathing Better: a partnership approach to improving air quality in West Sussex (2018) details the approach in West Sussex to tackling air pollution and improving air quality. The document details actions that are being undertaken by the District and

Borough Councils and proposes an 'Inter-authority Air Quality Group' to develop and deliver actions designed to improve air quality in West Sussex.

- 2.3.3 **Noise** is an issue that is related to air quality, given that problems are driven by traffic and industrial operations. Noise guidance provided by the World Health Organization states that "general daytime outdoor noise levels of less than 55 decibels adjusted (dBa) are desirable to prevent any significant community annoyance." The Noise Policy Statement for England (2010) addresses the effective management and control of environmental noise, neighbour and neighbourhood noise to be considered alongside other relevant sustainable development issues at the appropriate time. The Noise Action Plan: Agglomerations (2014) includes Brighton which Worthing is locating within. This addresses the management of noise issues arising from road, railway, aviation and industrial sources, setting long term strategies to manage noise and its impacts, while safeguarding quieter areas of the agglomeration.
- 2.3.4 The need to minimise travel and identify opportunities to promote walking, cycling and public transport are emphasised by the revised NPPF. Locally the West Sussex Transport Plan 2011-2026 sets out to increase the use of sustainable modes of **transport**, improve network efficiency in order to reduce emissions and delays, minimise the impact of HGVs on the local community, improve safety for all road users and reduce traffic emissions.
- 2.3.5 Protection and enhancement of **biodiversity** is promoted through several pieces of EU legislation, which include The Habitats Directive 92/43/EEC on the conservation of natural habitats and of wild **fauna and flora**, which established a suite of designated sites and introduced the precautionary principle; and The Birds Directive 2009/147/EC. The importance is further emphasised by the EU Biodiversity Strategy (2011), which aims to halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'. Within England, the Wildlife and Countryside Act (1981 as amended) is the main piece of legislation relating to nature conservation. The most recent England biodiversity strategy 'Biodiversity 2020 (2011) builds on the Natural Environment White Paper for England and provides a picture of how England is implementing its international and EU commitments. The 25 Year Environment Plan (2018) includes commitments to achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife and enhance biosecurity. The revised NPPF states planning policies and decisions should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. At a local level the Sussex Biodiversity Action Plan (2010) (BAP) identifies species and habitats most under threat, and sets out an agenda for action.

- 2.3.6 The Climate Change Act 2008 provides a framework to cut UK greenhouse gas emissions and build the UK's ability to adapt to the changing **climate**. The latest UK Climate Change Risk Assessment (2017) outlines the Governments' views on the key climate change risks and opportunities that the UK faces. It endorses six priority areas: flooding and coastal change, high temperatures, water shortages, risks to natural capital, food production and trade, pests, diseases and invasive non-native species. The UK Government's Clean Growth Strategy (2017) includes policies and proposals to accelerate the pace of clean growth i.e. increased economic growth and decreased emissions. The 25 Year Environment Plan (2018) includes a commitment to take all possible action to mitigate climate change while adapting to reduce its impact. The objective of promoting energy efficiency and renewable energy production has been the focus of EU legislation including EU Directive 2009/28/EC on the promotion of use of energy from renewable sources and the EU Directive 2010/31/EC on the energy performance of buildings. The revised NPPF highlights the important role planning can have in mitigating climate change by reducing greenhouse gas emissions from new developments and increasing the use and supply of renewable and low carbon energy. Locally the West Sussex Sustainability Strategy 2015-2019 and Action Plan identify four priority areas: embed sustainability within our business, valuing West Sussex, energy savings, and maximising benefits.
- 2.3.7 The avoidance and reduction of **flood risk** is championed by the EU Floods Directive 2007/60/EC. This requires Member States to assess all water courses and coastlines for risk and to plan adequate measures to reduce the risk. The revised NPPF directs development away from areas at highest flood risk and ensures where development is necessary in such areas, that it should be made safe for its lifetime without increasing flood risk elsewhere. The River Adur Catchment Flood Management Plan (2009) identifies long-term policies for managing flood risks from the river over the next 100 years. The Beachy Head to Selsey Bill Shoreline Management Plan (2006) considers flooding from the sea. The Rivers Arun to Adur Flood and Erosion Management Strategy (2010) aims to establish a sustainable policy for the management of coastal defences between the Rivers Arun and Adur over a 50 year period. The Flood and Water Management Act (2010) required County Councils to lead the coordination of flood risk. As the Lead Local Flood Authority (LLFA), West Sussex County Council produced a Local Flood Risk Management Strategy (2013) which outlines the risks from flooding and their responsibilities in managing that risk. West Sussex LLFA has also developed their own policy for the management of surface water.

- 2.3.8 The protection and enhancement of **water** quality and quantity is driven by the Water Framework Directive (WFD) (2000/60/EC), which requires a catchment-based approach to water management. The Framework Directive applies to coastal, transitional, surface water bodies and groundwater. It requires the achievement of 'good status' by an assigned deadline and no deterioration. The South East River Basin Management Plan (2015) provides a framework for protecting and enhancing the benefits provided by the water environment. It sets out how organisations, stakeholders and communities will work together to improve the water environment. The Bathing Water Directive (2006/7/EC) protects public health while offering an opportunity to improve management practices at bathing waters through an information dissemination classification system for the public with more stringent water quality standards. The directive aims to ensure all bathing waters meet a good mandatory standard. At the national level, the revised NPPF requires that planning decisions prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by pollution. The NPPF also expects developments to incorporate Sustainable Drainage Systems. The 25 Year Environment Plan (2018) includes a goal to achieve clean and plentiful water by improving at least three quarters of our waters to be close to their natural state as soon as is practicable. At a local level, the Arun and Western Streams Abstraction Licensing Strategy (2013) sets out how water resources are managed.
- 2.3.9 The European Thematic Strategy for Soil Protection (2006) seeks to protect and where contaminated, restore **soils**. In Safeguarding our Soils: A strategy for England (2009) preventing the pollution of soils and addressing the historic legacy of contaminated land is addressed, recognising that changing demands on our soils need to be better understood ensuring that 'appropriate consideration is given to soils in the planning process'. The revised NPPF calls upon the planning system to protect and enhance soils.
- 2.3.10 The European Landscape Convention (ELC) was the first international treaty to be exclusively devoted to all aspects of European **landscape** and covers both rural and urban areas. The ELC came into force in the UK in March 2007. It defines landscape as: "An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." It recognises that the quality of all landscapes matters – not just those designated as 'best' or 'most valued'. The revised NPPF refers to the need to protect and enhance valued landscapes and maintaining the character of the undeveloped coast. The 25 Year Environment Plan (2018) includes a goal to conserve and enhance the beauty of our natural environment by safeguarding and enhancing the beauty of our natural scenery. The South Downs National Park Partnership Management Plan



(2013) sets out an overarching 5 year strategy for the management of the National Park.

2.3.11 The Heritage Statement (2017) sets out the Government's vision and strategy for **heritage** and the historic environment. The Planning (Listed Buildings and Conservation Areas) Act 1990 relates to Listed Buildings and introduces Conservation Areas. The Ancient Monuments and Archaeological Areas Act 1979 make provision for the investigation, preservation and recording of matters of archaeological or historical interest. The revised NPPF establishes a need to set out a 'positive strategy' for the conservation and enjoyment of the historic environment, including those heritage assets that are most at risk. It is the Government's overarching aim that the historic environment and its heritage assets should be conserved for the quality of life they bring to this and future generations. The Culture White Paper (2016) recognises our historic built environment as a unique asset and has an overarching desire to give access for everyone to England's rich heritage in all its forms, recognising the role that culture plays in supporting jobs, skills, tourism and community identity and well-being. The Adur & Worthing Cultural Strategy (2016) sets a series of goals and priorities.

2.3.12 The EU Waste Framework Directive 2008/98/EC requires that the **waste** hierarchy is observed and is a material consideration in determining individual planning applications. The Government Review of Waste Policy in England also contains actions and commitments for key actors, which includes local authorities, to work towards a zero waste economy. The West Sussex Waste Local Plan (2014) includes an aspiration to achieve zero waste to landfill by 2031. The 25 Year Environment Plan (2018) includes a commitment to minimise waste and reuse **materials** as much as we can and it also includes a goal to ensure that resources from nature such as food, fish and timber are used more sustainably and efficiently.

## **Socio-Economic Context**

2.3.13 **Social inclusion** is promoted in the EU through the renewed European Sustainable Development Strategy (2006) and is considered one of the seven key challenges for the EU within the strategy. Within the revised NPPF, paragraph 8 sets out that the planning system has an overarching social objective which is: to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. The Integrated Communities Strategy Green Paper (2018) sets out the Government's vision for building strong integrated

communities. The revised NPPF also emphasises the need to: facilitate social interaction and create healthy, inclusive communities; promote retention and development of community services and facilities; ensure access to high quality open spaces and opportunities for sport and recreation; and promote vibrant town centres.

2.3.14 The revised NPPF outlines the social role the planning system plays in supporting the **health** & well-being of **communities** through the promotion and retention of community services, the setting of strategic policy to deliver health facilities, and providing access to high quality open spaces and opportunities for sport and recreation. A key message of the revised NPPF is to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. The Marmot Review Fair Society, Healthy Lives (2010) sets key policy actions that fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality. Locally the West Sussex Sustainable Community Strategy for 2008-2020 highlights essential areas for improvement which include reducing West Sussex's contribution to climate change, improving access to high quality education, reducing the difference in life expectancy between different demographics and increasing safety in West Sussex. The Sustainable Community Strategy for Worthing & Adur 2010-2026 is set around four priorities for change, which reflect the evidence and the views and needs of residents in Adur and Worthing, namely a better place to live, work and enjoy; better health and well-being for all; Learning, training and employment opportunities for all; and staying and feeling safe. The Adur and Worthing Council's Public Health Strategy 2018-2021 highlights significant health challenges including higher than average levels of obesity and alcohol misuse; low rates of physical activity; isolated older people and loneliness of all ages; early deaths from cancers; high incidence of mental health issues amongst our young people and low educational attainment. It sets out 5 priorities for enabling the better health and well-being of its communities:

- We all have the opportunity to enjoy good mental well-being and emotional resilience (at all life stages)
- We contribute to improved environmental sustainability
- We can all access and make positive use of our open spaces
- We all have the opportunity to enjoy a healthy lifestyle (diet, weight, smoking, physical activity, alcohol, drugs and sexual health)
- We can all enjoy good social connections via purposeful activity at all stages of our life.

2.3.15 The white paper "Fixing our broken **housing** market" (2017) prompted a wide range of reforms to the planning system including the Housing Delivery Test

to assess whether councils are delivering the homes they need. The revised NPPF seeks to ensure a wide choice of high quality homes, with more opportunities for home ownership. There is a need to plan for a mix of housing based on the local demography and the needs of the different groups within the local community. The NPPF recognises that larger developments are sometimes the best means of achieving a supply of new homes. It also acknowledges that small sites make a valuable contribution to housing supply. The Adur and Worthing Housing Strategy (2017-2020) sets out the Councils' housing priorities for the next five years and dovetails with the Councils' corporate priorities, other Council strategies and the strategies and priorities of other partners and stakeholders.

2.3.16 The Government's white paper: Industrial Strategy (2017) sets out a long-term plan to boost the productivity and earning power of people throughout the UK. The revised NPPF requires planning policies to positively and proactively encourage sustainable economic growth. Coastal West Sussex Economic Plan (2016-2020) sets out ambitions for the Coastal West Sussex **economy** and identifies actions that the Coastal West Sussex Partnership will take. The Adur & Worthing Economic Strategy (2018-2023) sets out ambitious plans for how the place will achieve "good growth". The Strategy identifies a small yet focused set of priorities where by working with partners, value can be added to make a real difference to the area's economic performance.

## 2.4 What is the sustainability baseline?

The SA Report must include:

- Relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan;
- Characteristics of areas / populations etc. likely to be significantly affected; and
- Existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

2.4.1 The baseline review is about tailoring and developing the problems/issues identified through context review so that they are locally specific. A detailed understanding of the baseline can aid the identification and evaluation of 'likely significant effects' associated with the Plan / alternatives.

2.4.2 The Worthing Local Plan SA Scoping Report (2015) presents a detailed review and key messages are presented below, updated to refer to the most recently available data. The full Baseline Review can be found in the Scoping Report.

### Introduction to the area

2.4.3 Worthing originally developed as a popular Victorian and Edwardian seaside resort from 1780 onwards. The surrounding medieval villages of Broadwater, Heene and West Tarring, were later engulfed by the expanding suburbs of Worthing. It is now one of the largest towns in West Sussex, with around 105,000 residents and a workplace population of approximately 55,000 people. Worthing is located on the south coast between the English Channel to the south and the South Downs National Park to the north. It is this high quality environment that helps to underpin and support the local economy and which is so valued by those who choose to live, study, work and visit here. In turn, this helps to generate an increasing requirement for homes, jobs and leisure opportunities. Worthing plays an important role within a wider sub-region with key links to other authority areas such as Adur, Arun, Brighton & Hove, Crawley and Horsham for housing, leisure and employment.

2.4.4 Much of Worthing occupies the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. It is a compact town and the built up area takes up over 2,282 hectares (68%) of the borough's geographical area (3,369 ha). The proportion of land within the current built up area increases to approximately 92% if the land that falls within the South Downs National Park (821 ha) is excluded. Whilst being principally an urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town. The seafront is one of Worthing's most important

assets acting as a focus for many of the historical buildings, gardens and public spaces that represent the Victorian seaside resort it once was. Within Worthing there are two main rivers, the Ferring Rife, towards the western boundary and the Teville Stream towards the eastern boundary which flows through the Brooklands Recreation Area both providing valuable habitat. Both rivers drain into the sea.

## Baseline

Environment			
The borough is home to a number of statutory and non-statutory nature conservation designations including 11 Local Wildlife Sites and Cissbury Ring (located within the National Park) which is a Site of Special Scientific Interest.	Within the borough there are 26 Conservation Areas; 9 Environmental Areas of Special Character and 360+ listed buildings. Of these Holy Trinity Church, Shelley Road and Castle Goring (within the National Park) are on the Heritage at Risk Register.	There are over 360 hectares of parks and open recreation spaces within the borough including Highdown Gardens (Registered as a Historic Park & Garden) and 10 Parks & Gardens registered as having local historic interest.	The West Sussex Local Flood Risk Management Strategy recognises Worthing as a priority 'Wet Spot' with 8,750 properties at surface water flood risk, 1,350 properties at river and sea flood risk and 300 properties at combined flood risk.
Air quality is generally good, but an Air Quality Management Area (AQMA) is in operation on the A27 (Upper Brighton Road) where most of the air pollution is generated by traffic. This was extended in 2014.	The Ferring Rife is classed as 'good' status, however the Teville Stream is heavily urbanised and currently classified as 'bad' status. Bathing water is classed by the Environment Agency as being 'good' quality.	There are significant groundwater resources in the north of the borough used for public drinking water supply. Worthing is in an area of serious water stress defined as 'water not available for licensing' and no new consumptive licenses will therefore be permitted.	The extensive chalk downlands, much of which falls within the South Downs National Park, are essential to the health of the town, in terms of its water supply, biodiversity, and opportunities for leisure and recreation.
To the east and west of the borough, areas of valuable open countryside form long established breaks in development between settlements. These are graded as the Best and Most Versatile Agricultural Land.	In 2016/17, 35.3% of household waste collected was sent for reuse, recycling or composting compared to 44.3% across West Sussex.	Important fisheries are located off the south coast between Shoreham and Littlehampton and a number of local fishermen regularly fish the near-shore zone in Worthing.	Located within the South Coast Plain National Character Area. The 7.5km of shoreline is home to a wide variety of flora and fauna and provides a great attraction for visitors and residents.

SOCIAL			
Population has risen over recent decades and is expected to continue to do so during the Plan period. There has been a 7.1% population increase between 2001 (97,600) and 2011 (104,600).	There are significant disparities within different areas of the town and three wards in Worthing (Heene, Central and Northbrook) fall within the lowest 20% of areas in England (using indicators of deprivation and educational attainment).	Population growth is largely driven by domestic migration with the majority of movements being from Adur and Brighton & Hove.	The percentage of the population in the over-75 age group is significantly higher than the South East region. However, the town has seen a relative decline in its 65+ year population over the last 20 years.
In May 2017 there were 1,277 households on the Housing Register. This very high level of affordable housing need is further evidenced within the Worthing Housing Study (2015) which calculates an affordable housing need of 435 dwellings per annum.	In 2017 average house prices were 11.35 times median earnings which is well above the national average - this has put home ownership beyond the reach of many households	The English Indices of Deprivation 2015 ranks Worthing 174th out of 326 local authorities.	Average life expectancy is 79.1 years which is slightly lower than the South East but higher than the England average. There is a stark difference (8.1 years) between the wards in Worthing with the highest and lowest life expectancy.
Between 2006 and 2017 a total of 3,141 new homes were built in the borough.	The percentage of obese adults is higher than the England average with physical activity of adults being slightly lower than average.	Worthing has a total stock of 50,000 homes (2017). The majority (90%) of the stock is in private sector ownership, which is slightly above the Coastal West Sussex average. 10% of the stock is owned by Registered Providers. There is no local authority owned stock.	Residents from minority ethnic groups make up a relatively small, but important proportion of the Worthing's population. However, central areas have a significant number of residents from other EU countries.

Economy			
Public transport services in the town are relatively good. There are five railway stations	Car ownership in Worthing is slightly higher than the national average. There are	Worthing is a net exporter of labour with a net outflow of approximately 1,000	In 2016 there were an estimated 296,000 staying trips and 3.6 million day tourist trips -

in the borough.	areas of heavy road congestion, especially at peak times.	workers.	with total expenditure in the local area by visitors estimated to be £143.5m.
The labour market is characterised by low economic activity. Workplace wages are also significantly lower than resident wages suggesting the types of employment roles available locally are less well paid than elsewhere in the sub-region.	Worthing has a strong manufacturing base, as well as a significant service sector led by large public sector employers and financial firms. The business base accommodates a slightly lower proportion of small businesses and higher proportion of medium-sized businesses compared to the regional average.	Worthing has a well-defined network / hierarchy of shopping areas (town centre, district centres and local / neighbourhood centres).	Productivity (measured by Gross Value Added per workforce job) is approximately £38k which is lower than the average for the rest of the South East and the UK.
Worthing is located within the Coastal West Sussex and Brighton & Hove Functional Economic Market Area (FEMA). Worthing is part of the 'Coast to Capital' Local Enterprise Partnership (LEP) which is a public and private sector partnership that seeks to improve economic prosperity.	The town has a good supply of hotels and guesthouses which offer a variety of accommodation types and standards - in 2016 there were 9 hotels with a total of 435 bedrooms. This supply is predominantly located on, or just off, Worthing seafront.	In employment terms the largest industries in Worthing (2015) were healthcare (26%), professional services (11%), retail (10%) and education (7%).	The retail economy has weathered reasonably well since the global recession in 2008 but its primary shopping areas could be performing more strongly. Vacancy rates for retail units are below the national average but slightly above the average for West Sussex.

## Limitations

2.4.5 In relation to equalities, it has not been possible to gain reliable data on sexual orientation to establish a baseline or identify trends. Supported and sheltered housing also provide an important resource for elderly and vulnerable people. At this stage it has not been possible to establish a baseline for sheltered or supported housing in Worthing.

## 2.5 What are the key issues and objectives?

The SA Report must include:

- Key problems / issues and objectives that should be a focus of / provide a framework for appraisal

2.5.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report was able to identify a range of sustainability problems / issues that should be a particular focus of SA, ensuring it remains focused.

**Table 2: The Sustainability Baseline and Key Sustainability Issues**

Scoping Report Topic	Key Sustainability Issues	Likely Evolution Without the Local Plan	Relevance to SEA, HIA & EqlA
Air Quality	<ul style="list-style-type: none"> <li>• Poor air quality exists along the A27 and the area affected is expanding</li> <li>• Traffic congestion is prevalent along main road networks</li> <li>• Source apportionment shows that HGV's and LGV's whilst making up only 3% of traffic in the AQMA, produce over 30% of the NO2 emissions.</li> </ul>	<ul style="list-style-type: none"> <li>• Air quality objectives may not be met if development is not located in the most sustainable locations</li> <li>• Inappropriate development could result in additional AQMA's being declared at other locations.</li> </ul>	SEA Topics: Biodiversity, Population, <b>Human Health</b> , Soil, Water, <b>Air</b> , Climatic Factors  HIA  EqlA
Biodiversity and Green Infrastructure	<ul style="list-style-type: none"> <li>• There is limited open space within and around Worthing. Development pressures may further threaten the biodiversity within these areas</li> <li>• The links between the urban area and the South Downs to the north and coastline to the south provide valuable wildlife corridors and green infrastructure networks which will need to be protected and enhanced.</li> </ul>	<ul style="list-style-type: none"> <li>• Opportunities to enhance existing habitats and improve networks and wildlife corridors could be missed without a co-ordinated approach through the Local Plan.</li> </ul>	SEA Topics: <b>Biodiversity</b> , Human Health, Flora, Fauna, Climatic Factors
Climate Change	<ul style="list-style-type: none"> <li>• Climate change will lead to sea level rise and more frequent and extreme weather events. This is likely to</li> </ul>	<ul style="list-style-type: none"> <li>• Flooding is likely to increase in the future.</li> <li>• Development may result in an increased flood risk</li> </ul>	SEA Topics: Biodiversity,



Adaptation and Flood Risk	<p>result in more severe and widespread periods of drought and flood events</p> <ul style="list-style-type: none"> <li>The areas at risk of flooding are likely to increase in the future as a result of climate change.</li> </ul>	<p>elsewhere if all sources of flood risk are not properly considered.</p> <ul style="list-style-type: none"> <li>Opportunities may be missed to improve management of local flood risk through the use of Sustainable Drainage Systems (SuDS), particularly on the redevelopment of brownfield sites.</li> </ul>	<p><b>Population, Human Health,</b> Fauna, Flora, Soil, <b>Water, Climatic Factors,</b> Material Assets, Cultural Heritage, Landscape</p> <p>HIA</p>
Climate Change Mitigation and Energy	<ul style="list-style-type: none"> <li>There is a need to develop renewable energy sources, and reduce greenhouse gases</li> <li>It is important that the downward trend in CO2 emissions is maintained</li> <li>In 2016 the Government scrapped its commitment to zero carbon homes.</li> </ul>	<ul style="list-style-type: none"> <li>The downward trend in CO2 emissions may not be maintained unless there is continued support and commitment to high energy efficiency standards and renewable energy schemes.</li> </ul>	<p>SEA Topics: Biodiversity, <b>Population,</b> Human Health, Fauna, Flora, Soil, Water, <b>Climatic Factors,</b> Material Assets, Cultural Heritage, Landscape</p> <p>HIA</p>
Community and Well-being (including equality and health)	<ul style="list-style-type: none"> <li>With the largest population growth among people in their 40's and significant proportion of over 60's the ageing population will have implications for demands on health and social care</li> <li>Some areas of Worthing are in the 10% most deprived in England. Educational attainment is relatively low and indicators of health show this is worsening. Inequalities relating to health, education and crime need to be</li> </ul>	<ul style="list-style-type: none"> <li>If the population continues to increase this will need to be accommodated. Without a Local Plan in place that seeks to deliver sustainable levels of growth, development, or a lack of development, may unintentionally affect groups based on race, gender, disability, age or religion. It is also possible to assume that health inequalities may worsen</li> </ul>	<p>SEA Topics: Population, <b>Human Health</b></p> <p>HIA</p> <p>EqIA</p>

	<p>addressed</p> <ul style="list-style-type: none"> <li>Worthing already has a high population density and the population is continuing to increase. This could result in potential health impacts unless adequate housing, open space and community facilities are provided.</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan can influence the wider determinants of health in relation to the environment, local economy and community that could impact on physical and mental health and help reduce health inequalities</li> <li>Health and social care services and infrastructure may not keep pace with new development thus impacting on people's ability to access these services.</li> </ul>	
Economy and Employment	<ul style="list-style-type: none"> <li>With continuing losses of office space it is important to retain key employment spaces as far as is possible</li> <li>Low levels of skills and educational attainment among the population with few links to higher education institutions</li> <li>There is limited space to accommodate new housing and employment space.</li> </ul>	<ul style="list-style-type: none"> <li>Without a Local Plan in place that will consider economic needs including employment land, the pressure for housing may lead to a lack of employment land which will constrain economic growth and investment</li> <li>Without the Local Plan, it is unlikely that infrastructure required to facilitate development can be coordinated and delivered.</li> </ul>	SEA Topics: Population, <b>Material Assets</b>
Historic Environment	<ul style="list-style-type: none"> <li>Heritage assets at risk from neglect, decay, or development pressures</li> <li>The need to conserve and enhance designated and non-designated heritage assets and the contribution made by their settings</li> <li>Accommodating change and growth whilst sustaining and enhancing the significance of heritage assets and the valued character of a place.</li> </ul>	<ul style="list-style-type: none"> <li>Conservation Areas and other heritage assets could be adversely affected by insensitive development.</li> </ul>	SEA Topics: Material Assets, <b>Cultural Heritage</b> , Landscape
Housing	<ul style="list-style-type: none"> <li>There is a continued need to provide housing to meet the needs of existing and future residents at a reasonable price</li> <li>The housing stock comprises of a high proportion of flats but demand is for houses</li> <li>The demand for housing through the housing register continues to exceed supply.</li> </ul>	<ul style="list-style-type: none"> <li>Without a Local Plan in place the right mix and tenure or sufficient level of new homes may not be provided. This would potentially have further economic and social effects.</li> </ul>	SEA Topics: <b>Population</b> , Human Health, Material Assets  HIA  EqIA

Landscape	<ul style="list-style-type: none"> <li>The need to maintain and enhance the high quality natural landscape</li> <li>The need to conserve and enhance the character and setting of Worthing's urban areas and its relationship with the coast and SDNP.</li> </ul>	<ul style="list-style-type: none"> <li>Unplanned development may unintentionally adversely affect the local landscape character of Worthing.</li> </ul>	SEA Topics: Biodiversity, Fauna, Flora, Soil, <b>Material Assets, Landscape</b>
Soils	<ul style="list-style-type: none"> <li>Previous focus on brownfield sites means there are a limited number of opportunities remaining to meet housing need on brownfield sites as evidenced in the Council's most recent Strategic Housing Land Availability Assessment (Update – December 2017).</li> <li>There are areas of high quality Grade 1 Agricultural Land on Greenfield sites around Worthing. This is an important resource for food production that should be recognised and protected in favour of lower quality land</li> <li>There are significant areas of contaminated land along the eastern boundary.</li> </ul>	<ul style="list-style-type: none"> <li>The current Worthing Core Strategy (2011) focuses on the regeneration of brownfield sites which is likely to result in remediation of contaminated land in some areas.</li> <li>As development pressures increase, the consideration of development on Greenfield sites may impact high grade agricultural land.</li> </ul>	SEA Topics: Biodiversity, Human Health, Fauna, Flora, <b>Soil</b> , Water
Transport	<ul style="list-style-type: none"> <li>Road congestion during peak periods affects many parts of the highway network throughout Worthing, disrupting journey times and causing poor air quality. Particular problems are on main routes into the town centre (A259 and A24) and along the A27</li> <li>The current provision of pedestrian and cycling facilities across the town could be improved to help support and maintain sustainable travel</li> <li>The current rail services are also at capacity during peak times.</li> </ul>	<ul style="list-style-type: none"> <li>Road congestion is likely to worsen without improvements affecting residents, businesses, visitors and commuters.</li> </ul>	SEA Topics: Population, <b>Human Health, Air</b> , Climatic Factors  HIA  EqIA
Waste	<ul style="list-style-type: none"> <li>The reuse of building materials should be promoted to reduce the amount of construction waste generated</li> <li>There has been a decrease in the recycling rate. Improvements are needed and measures to promote recycling encouraged to reduce the proportion of waste</li> </ul>	<ul style="list-style-type: none"> <li>Rates of recycling have been decreasing. This is likely to continue unless measures are put in place to reverse this trend. Without mitigation measures, there is likely to be increased waste generated as a result of an increasing population and related</li> </ul>	SEA Topics: Population, <b>Climatic Factors</b> Landscape

	<p>sent to landfill</p> <ul style="list-style-type: none"> <li>It will be important to reduce the amount of waste produced to avoid further amounts sent to landfill as a result of population growth.</li> </ul>	housing and employment growth.	
Water	<ul style="list-style-type: none"> <li>There is already a shortage of water resources which is impacting on the local ground and surface waters. This is likely to worsen as a result of further growth</li> <li>Vital groundwater supplies, coastal bathing waters and rivers are vulnerable to pollution and failing to reach quality targets.</li> </ul>	<ul style="list-style-type: none"> <li>The requirements of WFD and Catchment Plans already in place are likely to result in an improvement in water quality. However this relies on work with partners and stakeholder including Local Authorities. Without the Local Plan some opportunities may be lost.</li> </ul>	SEA Topics: Biodiversity, <b>Population</b> , Human Health, Fauna, Flora, Soil, <b>Water</b> , Climatic Factors

2.5.2 The issues identified above were then refined further into a more discrete list of sustainability objectives. The following is a list of sustainability objectives that reflects the sustainability issues established through the context and baseline review. The list of objectives provides a methodological framework for appraisal, ensuring it remains focused and concise. The objectives were identified at Scoping Stage, however these have been reviewed in light of the comments received and following advice from the Planning Advisory Service (PAS) to ensure they remain relevant, effective and consistent with national policy changes.

**Table 3: Integrated Impact Assessment Framework**

IIA Objective		Relevance to Scoping Report Theme	Supporting Criteria <i>Will the site/policy proposal under consideration...</i>	Commentary	Relevance to SEA, HIA & EqlA
1. Environmental Quality	To protect and improve air and water quality and reduce pollution.	Air Quality  Water	<ul style="list-style-type: none"> <li>Contribute to achieving good ecological status or potential as a requirement under WFD?</li> <li>Ensure there is adequate capacity in water and wastewater infrastructure?</li> <li>Minimise health risks associated with pollution?</li> <li>Improve local air quality, especially in AQMAs?</li> </ul>	In some areas measures show pockets of poor air and water quality. This has been attributed to historic management, land uses and traffic congestion. It is important that these resources are protected and opportunities taken to improve their quality as part of development. There is one AQMA in Worthing which has recently been expanded to cover a wider area.	SEA Topics: Biodiversity, Population, Human Health, Soil, <b>Water</b> , <b>Air</b> , Climatic Factors  HIA  EqlA
2. Biodiversity	To conserve, protect and enhance habitats and natural species diversity, green infrastructure networks and wildlife corridors.	Biodiversity and Green Infrastructure	<ul style="list-style-type: none"> <li>Achieve a net gain in biodiversity locally?</li> <li>Ensure no net loss of Priority Habitat?</li> <li>Deliver opportunities to protect, restore or enhance biodiversity?</li> <li>Promote the connectivity of habitats as part of an ecological network?</li> </ul>	There is limited space available in Worthing to provide habitats. This means even smaller sites with biodiversity and the networks of wildlife corridors which provide connectivity are highly valued.	SEA Topics: <b>Biodiversity</b> , Fauna, Flora, Climatic Factors

3. Land and Soils	Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials.	Soils	<ul style="list-style-type: none"> <li>• Direct development to brownfield sites before Greenfield?</li> <li>• Support remediation of contamination as part of the redevelopment of brownfield sites?</li> <li>• Protect agricultural and best and most versatile soil?</li> <li>• Will it encourage the re-use of buildings?</li> <li>• Will it help to reduce the number of vacant / derelict buildings?</li> </ul>	The limited space available in Worthing for development means a range of sites and options will need to be considered. Previously undeveloped land and high quality agricultural soils are finite resources.	SEA Topics: <b>Soil</b> , Material Assets, Landscape
4. Energy	To manage energy use, contributing to climate change mitigation.	Climate Change Mitigation and Energy	<ul style="list-style-type: none"> <li>• Improve sustainability of buildings?</li> <li>• Increase the amount of energy from renewable and low carbon technologies?</li> <li>• Will it improve insulation, internal air quality and energy efficiency in existing housing to reduce fuel poverty?</li> <li>• Promote recycling, reuse and reduction of materials to reduce the levels of waste to landfill?</li> <li>• Will it help reduce greenhouse gas emissions?</li> <li>• Will it help reduce dependency on non-renewable energy sources?</li> <li>• Will it encourage and improve efficient use of energy?</li> </ul>	Further growth and development is likely to cause increased emissions and waste, contributing to climate change unless mitigated. As one of the greatest sources of greenhouse gas emissions in the borough are from road transport there are clear links between this and the 'travel and access' objective which aims to reduce car use.	SEA Topics: Biodiversity, Population, Human Health, Fauna, Flora, Soil, Water, Air, <b>Climatic Factors</b> , Material Assets, Cultural Heritage, Landscape  HIA  EqIA
5. Water Management	To ensure water is effectively managed to adapt to the effects of climate change.	Water  Climate Change Adaptation and Flood Risk	<ul style="list-style-type: none"> <li>• Reduce demand for water?</li> <li>• Promote the use of Sustainable Drainage Systems (SuDS)?</li> <li>• Direct development to areas of lowest flood risk?</li> <li>• Will it safely manage and reduce</li> </ul>	Climate change will result in more extreme weather events including more frequent and severe floods and droughts. The baseline data shows that parts of Worthing are already at risk of flooding from a variety of sources.	SEA Topics: Biodiversity, Population, Human Health, Fauna, Flora, Soil, Water,

			<p>the risk of flooding?</p> <ul style="list-style-type: none"> <li>Will it safeguard groundwater resources?</li> <li>Will it minimise the impacts of climate change on health and well-being, particularly on vulnerable groups?</li> </ul>	<p>There are links between these and the 'environmental quality' objective regarding water quality.</p>	<p>Material Assets</p> <p>HIA</p> <p>EqlA</p>
6. Landscape and Character	To protect and enhance landscape, the quality, character and appearance of the landscape, maintaining and strengthening local distinctiveness and sense of place.	Landscape	<ul style="list-style-type: none"> <li>Conserve and enhance the character and quality of natural landscapes, countryside and coast?</li> <li>Protect and enhance the setting to the South Downs National Park?</li> <li>Respect existing settlement patterns and maintains separation between settlements?</li> <li>Will any new development be appropriately integrated with existing development and the surrounding environment?</li> </ul>	<p>The importance of and protecting and enhancing local landscapes particularly in relation to the SDNP and coastline has been identified. It is recognised that there will be links between this, the 'built environment' 'historic environment' and 'biodiversity' objectives.</p>	<p>SEA Topics: Biodiversity, Fauna, Flora, Soil, Material Assets, Cultural Heritage, <b>Landscape</b></p>
7. Built Environment	To protect the built character of the townscape and secure the delivery of high quality design.	Historic Environment Landscape	<ul style="list-style-type: none"> <li>Promote high quality urban design?</li> <li>Protect and enhance the character and local distinctiveness of townscapes?</li> <li>Ensure integration of new development with their surrounding context?</li> <li>Will it enhance and promote the perceived sense of place?</li> <li>Will it enhance the quality of the public realm?</li> </ul>	<p>This is likely to be a key issue in Worthing as the limited amount of land is likely to result in brownfield development within existing towns and settlements. Creating a high quality built environment can also help contribute to the achievement of economic objectives. There are links between this and the 'historic environment', 'crime and public safety' and 'communities' objectives.</p>	<p>SEA Topics: Population, Human Health; Material Assets, <b>Cultural Heritage</b>, Landscape</p> <p>HIA</p> <p>EqlA</p>

8. Historic Environment	To preserve and enhance the historic environment.	Historic Environment	<ul style="list-style-type: none"> <li>Will it conserve or enhance heritage assets (including designated and locally important assets) and their setting?</li> <li>Will it promote the sensitive re-use of historic or culturally important buildings where appropriate?</li> </ul>	The historic environment is also an important component of the character of the built environment. Historic England advises that a specific objective for the preservation and enhancement of the historic environment will always be necessary.	SEA Topics: Material Assets, <b>Cultural Heritage</b> , Landscape
9. Healthy Lifestyles	To help people live healthier lifestyles and reduce inequalities through physical activity and maximise health and well-being.	Community and Well-being (including equality and health)	<ul style="list-style-type: none"> <li>Promote active travel by improving access to footpaths and cycle routes?</li> <li>Provide opportunities for play, sport and recreation?</li> <li>Promote access to healthier foods / allotments / food growing?</li> <li>Will it increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities?</li> <li>Will it improve the quantity and quality of publicly accessible open space?</li> </ul>	Pockets of Worthing suffer with deprivation in relation to health. In these areas life expectancy is relatively shorter and linked to a range of poorer health behaviours and outcomes including obesity. Health is a cross cutting issue and several other objectives also separately address determinants of health.	SEA Topics: <b>Population, Human Health</b>  HIA  EqIA
10. Crime and Public Safety	To create safe sustainable environments which promote social cohesion, security and reduce fear of crime.	Community and Well-being (including equality and health)	<ul style="list-style-type: none"> <li>Promote sustainable mixed use environments?</li> <li>Improve road safety for all users?</li> <li>Ensure sites are designed in a way to promote natural surveillance?</li> <li>Will it reduce levels of crime, the fear of crime and anti-social behaviour?</li> </ul>	Worthing generally has a low crime rate however anti social behaviour is a key issue particularly in wards with higher levels of deprivation.	SEA Topics: <b>Population, Human Health</b>  HIA  EqIA
11. Housing	To provide high quality, homes for all (including affordable),	Housing	<ul style="list-style-type: none"> <li>Support increased dwelling completions to meet the local need?</li> <li>Does it provide high quality homes</li> </ul>	There is significant need for housing in Worthing. It is important that the housing proposed meets the local need in terms of mix and affordability.	SEA Topics: <b>Population, Human Health, Material Assets</b>



	which includes a range of size, types and tenures that are appropriate to local needs?		<p>within an attractive environment?</p> <ul style="list-style-type: none"> <li>• Deliver a mix of housing to meet identified needs of key local groups including Gypsies and Travellers?</li> <li>• Will it increase the supply of affordable housing?</li> <li>• Will it reduce homelessness?</li> <li>• Will it provide adaptable homes for independent living for older and disabled people?</li> <li>• Will it provide homes that meet the needs of older people including extra care etc?</li> </ul>		<p>HIA</p> <p>EqlA</p>
12. Communities	To create and support sustainable vibrant communities where people enjoy living and to ensure equitable outcomes for all particularly those most at risk of experiencing discrimination, poverty and social exclusion.	Community and Well-being (including equality and health)	<ul style="list-style-type: none"> <li>• Provide key services and facilities?</li> <li>• Encourage provision of well-designed public spaces?</li> <li>• Create communities that are adaptable to the needs of an increasingly elderly population including dementia friendly development?</li> <li>• Ensure infrastructure has sufficient capacity to support new communities?</li> <li>• Will it help reduce social inequality, poverty and social exclusion in communities in the area?</li> <li>• Will it help reduce deprivation?</li> <li>• Will it promote accessibility for those who are elderly or disabled?</li> <li>• How will different groups of people be affected including BME, women, disabled, LGBT, older people, young people, and faith groups? Will it benefit the groups listed above?</li> </ul>	It is important that neighbourhood communities are created and supported through the provision of social as well as physical infrastructure. Good design is recognised as key in creating inclusive developments.	<p>SEA Topics: <b>Population, Human Health</b></p> <p>HIA</p> <p>EqlA</p>

13. Education	Raise educational achievement and skills levels to enable current and future residents to remain in work, and access good quality jobs.	Economy and Employment	<ul style="list-style-type: none"> <li>• Improve accessibility to existing educational facilities?</li> <li>• Facilitate the provision of new high quality educational facilities?</li> <li>• Ensure adequate provision of skills/training facilities?</li> </ul>	There is relatively low educational attainment and skills in Worthing. It is important that residents of all ages and abilities can fulfil their potential and have the skills needed to fulfil their own objectives and secure employment. There are clear links between this and the 'economy' objective.	SEA Topics: <b>Population</b> , Human Health  HIA  EqIA
14. Economy	To attract and sustain inward investment and support sustainable growth of industry to improve the resilience and diversity of the local economy.	Economy and Employment	<ul style="list-style-type: none"> <li>• Facilitate a sustainable visitor economy?</li> <li>• Provide space for new businesses and to enable the expansion of existing?</li> <li>• Increase the number, variety and quality of employment opportunities?</li> <li>• Facilitate the provision of good quality infrastructure to promote economic growth?</li> </ul>	Economic growth is a key priority of the Council. There is currently a strong service sector and visitor economy. A large number of companies in Worthing are micro businesses. It is important that these are supported and appropriate employment space is available for expansion.	SEA Topics: <b>Population</b> , Human Health; <b>Material Assets</b> HIA  EqIA
15. Town and Local Centres	Improve the range, quality and accessibility of wider town centre uses, and ensure the vitality and viability of existing centres.	Economy and Employment	<ul style="list-style-type: none"> <li>• Provide new or improved leisure, recreational, or cultural activities?</li> <li>• Maintain or increase the amount of floorspace provided for 'town centre uses' within town centres?</li> <li>• Protect key retail areas?</li> <li>• Facilitate regeneration?</li> </ul>	Worthing has clearly defined town, district and local centres. It will be important that redevelopment promotes the vitality and viability of existing centre(s) and maintains the balance between these.	SEA Topics: Population, Cultural Heritage
16. Travel and Access	Improve access to and from sustainable	Transport	<ul style="list-style-type: none"> <li>• Increase non-car accessibility to existing services/facilities?</li> <li>• Improve public transport links?</li> </ul>	The Local Plan can have a strong influence on sustainable development by directing and managing development in	SEA Topics: Population, Human Health,

	modes of transport.		<ul style="list-style-type: none"> <li>• Promote accessibility and safe local routes for pedestrians and cyclists?</li> <li>• Ensure streets are designed to be safe functional and accessible for all?</li> <li>• Will it integrate with existing transport networks?</li> <li>• Will it help improve road safety?</li> </ul>	a way so that it increases non-car accessibility and improves access to public transport. Securing non-car access to development can have multiple secondary sustainability benefit, for instance relating to air quality, noise, built environment, as well as supporting the economy and as part of a healthy lifestyle.	<b>Air, Climatic Factors, Material Assets</b>  HIA  EqIA
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2.5.3 The compatibility of the objectives was originally published in the SA Scoping Report, March 2015. The compatibility of the revised objectives has been re-tested in the matrix below to identify any conflicts using the following key:

✓	Objectives are compatible
X	Potential for conflict between objectives
Blank	Neutral compatibility
?	Uncertain

**Table 4: Compatibility of Objectives**

Objectives	1 Env. Quality															
	2 Biodiversity	✓														
	3 Land/Soils	✓	✓													
	4 Energy / CC mitigation	✓	✓	✓												
	5 Water / CC adaption	✓	✓	✓	✓											
	6 Landscape & Character	✓	✓	✓												
	7 Built Env.			✓		✓	✓									
	8 Historic Env.			✓		✓	✓	✓								
	9 Health	✓	✓	✓	✓		✓	✓								
	10 Crime & Safety			✓				✓			✓					
	11 Housing	X	X	X	X	X	X	✓	X	?	✓					
	12 Communities	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓				
	13 Education									✓	✓	X	✓			
	14 Economy	X	X	X	X	X	X	✓	X	✓	✓	X	✓	✓		
	15 Town & Local Centres	✓	X	✓	✓	✓		✓	✓	✓	✓	X	✓		✓	
	16 Travel & Access	✓	✓		✓		✓	✓		✓	✓	✓	✓	✓	✓	✓
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	Objectives															

2.5.4 It is evident from this assessment that many objectives are compatible meaning they strengthen and support each other. The main conflicts arise between objectives which have a focus on development, such as housing (11) and economy (14) and the environmental objectives. Potential conflicts between these and other objectives are described in more detail in the table below. Potential for mitigation and opportunities are also described.

**Table 5: Potential conflicts between Sustainability Appraisal Objectives**

Conflicting Objectives	Comments	Mitigation/Opportunities
11 x 1	Housing delivery has potential to conflict with environmental quality as will result in an increased population which could lead to increased traffic and air pollutants, will increase demand for water thus impacting on water quality, will increase pressure on water infrastructure, and could be a source of noise and light pollution.	New housing provides the opportunity to deliver sustainable buildings which consider and reduce impacts on environmental receptors.
11 x 2	Housing delivery has potential to conflict with biodiversity as could result in loss of habitats including links between habitats, and/or species.	New housing provides the opportunity to deliver sustainable buildings which incorporate features that

		enhance biodiversity.
11 x 3	Housing delivery has potential to conflict with land and soils as could result in loss of agricultural and greenfield land to housing.	New housing provides the opportunity to incorporate food growing space and incorporate greenfield features, such as those provided by ecosystem services.
11 x 4	Housing delivery has potential to conflict with energy use/climate change mitigation as is likely to cause an increase in greenhouse gas emissions from domestic energy consumption.	New housing provides the opportunity to deliver energy efficient buildings.
11 x 5	Housing delivery has potential to conflict with climate change adaptation as an increased population will result in increased demand for water resources. In addition, additional building mass may contribute to increasing the urban heat island effect exacerbating the impacts of climate change and could increase the risk of flooding.	New housing provides the opportunity to incorporate water efficient design, measures that reduce flood risk and include features which ensure adaptability to climate change.
11 x 6	Housing delivery has potential to conflict with protection of the landscape character as could result in impacts on the setting of the SDNP, could result in the loss of existing separation between settlements, and could increase recreational pressure.	New housing provides the opportunity to incorporate sensitive design which considers the surrounding natural environment.
11 x 8	Housing delivery has potential to conflict with the preservation of the historic environment.	New housing provides the opportunity to incorporate sensitive design which considers the surrounding historic environment.
11 x 9	It is uncertain whether housing delivery is compatible or incompatible with healthy lifestyles. New housing could provide a range of tenure to meet local need and provide adaptable homes for independent living for older and disabled people. However, housing delivery could increase pressure on open space due to increased demand and could result in loss of open spaces to housing.	New housing provides the opportunity to incorporate features and spaces which facilitate healthy lifestyles.
11 x 13	Housing delivery has potential to conflict with education as could increase pressure on local school infrastructure.	New housing may be able to contribute to increasing school capacity through CIL/S106 agreements.
11 x14	Housing delivery has potential to conflict with economy as sites for housing could compete with sites for employment uses.	New housing will provide construction based employment opportunities, as well as lead to an increase in service sector jobs required to meet the needs of an increased population.
11 x 15	Housing delivery has potential to conflict with local/town centre uses as could increase pressure on existing facilities.	New housing may help to improve centres in decline through increased footfall. New housing may be able to contribute to increasing facilities and services through S106 agreements.
14 x 1	Economic growth has potential to conflict with environmental quality as could result in traffic and air pollutants and could be a source of noise, odour and light pollution.	New commercial development provides the opportunity to deliver sustainable buildings which consider and reduce impacts on environmental

		receptors. In addition, inward investment could support improvements to transport infrastructure.
14 x 2	Economic growth has potential to conflict with biodiversity as could result in loss of habitats including links between habitats, and/or species.	New commercial development provides the opportunity to deliver sustainable buildings which incorporate features that enhance biodiversity.
14 x 3	Economic growth has potential to conflict with land and soils as could result in loss of agricultural and greenfield land.	New commercial development provides the opportunity to incorporate greenfield features within development, e.g. infrastructure which reduces flood risk.
14 x 4	Economic growth has potential to conflict with energy use/climate change mitigation as is likely to cause an increase in greenhouse gas emissions from energy consumption and transport movements.	New commercial development provides the opportunity to deliver energy efficient buildings.
14 x 5	Economic growth has potential to conflict with climate change adaptation as could result in increased demand for water resources. In addition, additional building mass may contribute to increasing the urban heat island effect exacerbating the impacts of climate change and could increase the risk of flooding.	New commercial development provides the opportunity to incorporate SUDS and include features which ensure adaptability to climate change. In addition, inward investment could support improvements to infrastructure which reduces flood risk.
14 x 6	Economic growth has potential to conflict with protection of the landscape character as could result in impacts on the setting of the SDNP, could result in the loss of existing separation between settlements, and could increase recreational/visitor pressure.	New commercial development provides the opportunity to incorporate sensitive design which considers the surrounding natural environment.
14 x 8	Economic growth has potential to conflict with the preservation of the historic environment.	New commercial development provides the opportunity to incorporate sensitive design which considers the surrounding historic environment.
15 x 2	Provision of new facilities and an increase in town centre floorspace has potential to conflict with biodiversity as could result in loss of habitats and/or species.	New development provides the opportunity to incorporate features which enhance biodiversity.

2.5.5 Site specific criteria (Appendix C) have been developed to enable a robust process to be undertaken and ensure that each site is appraised in a consistent way. The criteria is based on the IIA Framework Objectives and seeks to provide an objective and replicable method to assessing potential sites. Where possible the IIA Framework has been adapted to provide quantitative criteria. The criteria sets out the scoring for each indicator and uses GIS, constraint mapping and findings of evidence studies to highlight the merits of each site and record the differences between sites. The sites criteria and methodology was consulted on as part of the SA Scoping Consultation and was subsequently updated to take account of comments received.

## Part 3: What has Plan making involved up to this point?

The SA Report must include:

- An outline of the reasons for selecting the alternatives dealt with;
- The likely significant effects on the environment associated with alternatives; and
- An outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives are reflected in the draft plan).

### 3.1 A new Local Plan

- 3.1.1 The Worthing Core Strategy was adopted in 2011 and the intention was that it would help to guide development until 2026. However, it must now be reviewed to reflect latest national policy, particularly with regard to how we now need to plan for housing.
- 3.1.2 An initial public consultation was undertaken in May 2016 titled ‘Your Town – Your Future’. This consultation was the first stage in preparing the Plan. It sought views and suggestions on how Worthing should grow and develop in the future. The consultation document identified issues and challenges facing the borough and the options that could help address them. It did not state which sites it will be looking to allocate for development in the new Plan but with reference to key evidence invited views on key issues, options and opportunities. The consultation document also proposed a draft Vision and set of Strategic Objectives.
- 3.1.3 The responses received to the ‘Your Town – Your Future’ consultation indicated in general, support for the Vision and Objectives and agreement with the issues and challenges identified. A recurring theme was the need to protect all greenfield sites until such time that brownfield opportunities had been exhausted. In addition, a number of respondents promoted more sustainable solutions and a ‘greener’ Plan.

### 3.2 Reasons for selecting alternatives

- 3.2.1 At this stage a number of evidence base studies had been produced and the findings of these informed the options presented in the ‘Your Town – Your Future’ consultation.
- 3.2.2 **Worthing Housing Study (June 2015):** Concluded that the full Objectively Assessed Need (OAN) for housing in the borough (2013-2033) is 636 dwellings per annum. This is significantly more dwellings than are currently being delivered or that are planned for in the Core Strategy. The need to balance this pressing need for development within a constrained and

environmentally sensitive borough with limited development opportunities was highlighted.

- 3.2.3 Given the high need identified, it was acknowledged that all realistic development options would need to be tested to assess whether they could contribute to meeting this need. To understand the capacity of the borough the Strategic Housing Land Availability Assessment (SHLAA) (2017) was used to assess the amount of land available for housing development. As part of this the Council undertook a comprehensive review of all sites in the town with the potential to deliver housing. This included those that had been promoted during a 'call for sites'. As part of this Local Plan consultation, landowners, agents and developers were reminded to submit sites to the Council at any time that they feel might be appropriate for development. As a result the consultation identified and included 10 potential sites for development within the town and 8 edge of town sites, five of which lie outside the current Built Up Area Boundary. All of these are assessed below. The SHLAA is updated and published annually as part of the Council's Annual Monitoring Report.
- 3.2.4 **Worthing Landscape and Ecology Study (2015):** Reviewed the edge of town sites and taking landscape, ecological and visual assessments into account the study concluded the overall suitability for development for each site. Given the need for new development a further review was then undertaken of any sites considered to have a low suitability. A further two sites identified through the 2016 Local Plan consultation were also assessed and an addendum was published in 2017. As a result of this study it was decided that based on this evidence some sites were not suitable for development and were subsequently screened out as options.
- 3.2.5 **Worthing Economic Research & Employment Land Review (May 2016):** Identified a demand for small scale, high quality office space in accessible locations, and a severe shortage of, and strong local demand for industrial units. The options of continuing to protect key employment areas or taking a more flexible approach were identified as part of the 'Your Town – Your Future' consultation. There was also a 'call for sites' that could accommodate employment growth.
- 3.2.6 Following the Local Plan consultation, further evidence studies were completed which together with the consultation responses helped to further identify and refine options.
- 3.2.7 **Worthing Retail & Town Centre Uses Study (2017):** Borough wide retail and commercial study to understand the current health and performance of the borough's retail and leisure offer within the existing network of town



centres and set out current and future needs for additional floorspace for the town over the Plan period to 2033. It also provides recommendations regarding the suitability of the Council's existing policy approach in respect of retail and town centre uses.

- 3.2.8 **Local Green Space Designation (2018):** Landscape statements drawing on the evidence from the Landscape and Ecology Study to assess the suitability of designating three sites (Brooklands, Goring Ferring Gap and Chatsmore Farm) as Local Green Space.
- 3.2.9 **Worthing Local Plan Transport Assessment (2018):** This report sets out the transport impacts of the options for development being tested as part of the Worthing Local Plan. The assessment proposed a broad package of measures that could be appropriate to provide an appropriate level of accessibility for each site, and further measures that address the cumulative impacts of the new development. The transport assessment has demonstrated that the proposed Worthing Local Plan would not have any significant impact on the performance of the Strategic Road Network.
- 3.2.10 Specifically in line with the Regulations, it is the aim of this part of the SA Report to present information on the likely significant effects associated with the alternatives and an outline of the reasons for selecting the preferred approach. As the Local Plan is at an early stage, these are reported on in Part 4 of this Draft Report.

## Part 4: What are the appraisal findings at this current stage?

The SA Report must include:

- The likely significant effects associated with the draft plan; and
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects.

### 4.1 Introduction

4.1.1 The aim of Part 4 is to present appraisal findings and recommendations in relation to the Draft Worthing Local Plan.

4.1.2 At the end of this chapter, conclusions of the overall sustainability of the different alternatives are provided alongside recommendations to inform the selection, refinement and publication of proposals for the Local Plan.

### 4.2 Methodology

4.2.1 The appraisal identifies and evaluates 'likely significant effects' of all reasonable alternatives, including the preferred approach, on the baseline, drawing on the sustainability objectives and issues identified as a methodological framework.

4.2.2 A scoring system is used to appraise options against the framework and to give an indication as to whether they are likely to have a positive or negative significant effect:

++	Very positive effects – the option would significantly help in achieving the objective
+	Positive effect – the option would help in achieving the objective
/	Neutral effect – the option would neither help nor hinder the achievement of the objective
-	Negative effect – the option would be in conflict with the objective
--	Very negative effect – the option would be in significant conflict with the objective
?	Uncertain – more information needed
0	No effect likely – there is no relationship between the option and the objective

4.2.3 The methodology for appraising options was initially proposed as part of the Scoping Report to ensure a consistent and transparent approach would be taken to assess how options perform against the framework. This was subsequently revised to take account of comments received and to ensure it was fit for purpose.

4.2.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.

4.2.5 The SEA Directive sets criteria for determining the likely significance of effects. They are a combination of:

- The magnitude of the Plan's effects, including the degree to which the Plan sets a framework for projects, the degree to which it influences other Plans, and environmental problems relevant to the Plan.
- The sensitivity of the receiving environment, including the value and vulnerability of the area, exceeded environmental quality standards, and effects on designated areas or landscapes.
- Effect characteristics, including probability, duration, frequency, reversibility, cumulative effects, transboundary effects, risks to human health or the environment, and the magnitude and spatial extent of the effects.

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

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

### 4.3 Appraisal of Local Plan Strategic Objectives

4.3.1 The strategic objectives for the Worthing Local Plan were published in the Your Town Your Future consultation, May 2016. These are set out in Part 2 of this report. The purpose of the strategic objectives is to provide a link to the vision and three key roles (economic, social and environmental) for the planning system. The objectives provide the direction for the spatial strategy and policies for the plan area.

4.3.2 Stage B1 of the SA process requires the Strategic Objectives of the Local Plan to be tested against the sustainability framework. This helps to identify where objectives are compatible and where conflicts may arise. The following key is used to test compatibility:

√	Positive effect / compatible with sustainability objectives
	No or neutral effect / no direct relationship
X	Negative effect / conflicts with sustainability objectives
?	Uncertain, not possible to predict effects
√/X	Mixed impacts

**Table 6: Compatibility of Strategic Objectives against IAA Framework**

		IIA Appraisal Objectives															
		1 Env Quality	2 Biodiversity	3 Land/Soils	4 Energy	5 Water	6 Landscape	7 Built Env	8 Historic Env	9 Health	10 Crime	11 Housing	12 Communities	13 Education	14 Economy	15 Town Centres	16 Travel
Local Plan Strategic Objectives	1 Housing	X	X	X	X	X	X	√	X	X	√	√	√	X	X	X	√
	2 Affordable housing	X	X	X	X	X	X	√	X	X	√	√	√	X	X	X	√
	3 Access to Services	√						√		√	√		√	√	√	√	√
	4 Infrastructure	√	X	X	√	√	X	√	X	√	√	√	√	√	√	√	√
	5 Residential character						√	√	√	√	√	√	√				
	6 Reduce inequalities							√	√	√	√	√	√		√	√	√
	7 Healthy environment	√						√		√	√		√		√		
	8 Employment sites	X	X	X/√	X	X	X	√	X	X	√	X	√	√	√	√	√
	9 Town Centre	X		√				√	√		√		√		√	√	√
	10 Retail, Culture, Leisure	X		√	X	X		√	√	√	√		√		√	√	√
	11 Transport	√					√	√	√	√	√				√	√	√
	12 Tourism	X			X	X	√	√	√				√		√	√	√
	13 Public Realm	√	X	X	√	√	X	√	√	√	√	√	√	√	√	√	√
	14 Skills and jobs							√	√					√	√	√	
	15 Green space	√	√	√		√	√			√		X	√		√		
	16 Natural env	√	√					√	√	√	√				√	√	√
	17 Land use efficiency		√	√	√		√	√		√		√			√	√	
	18 Character & heritage		√	√			√	√	√				√		√	√	
	19 Climate change	√	√	√	√	√	√			√							√
	20 Sustainable transport	√								√	√		√		√	√	√

4.3.3 The assessment identified that many of the objectives of the Draft Worthing Local Plan and the IAA framework are compatible, which means they strengthen and support each other. Potential conflicts are described in more detail in the following table:

**Table 7: Potential conflicts between IIA Objectives and Plan Objectives**

<b>IAA Objective</b>	<b>Plan Objective</b>	<b>Description of potential conflict</b>	<b>Mitigation/Considerations</b>
1) Environmental Quality	1) Housing Delivery 2) Affordable Housing 8) Retain, enhance employment 9) Worthing Town Centre 10) Retail, culture, leisure 12) Tourism	There could be conflict between the strategic objectives that relate to development, including housing, employment, commercial, leisure and tourism-based development and this IIA objective due to the potential for increased traffic and air pollutants, increased demand for water and potential for other forms of pollution.	Policies should seek to reduce the need to travel by car, promote and enable sustainable forms of travel, should specify how resources should be used sustainably and should seek to reduce various forms of pollution.
2) Biodiversity	1) Housing Delivery 2) Affordable Housing 4) Community Infrastructure 8) Retain, enhance employment 13) Strategic infrastructure	There could be conflict between the strategic objectives that relate to housing delivery, infrastructure and employment and this IIA objective due to potential for loss of habitats and/or species. This will be dependent on what is delivered, how it is delivered and the site developed.	Policies should seek to protect and enhance biodiversity and encourage the incorporation of multi-functional biodiverse design features.
3) Land & Soils	1) Housing Delivery 2) Affordable Housing 4) Community Infrastructure 8) Retain, enhance employment 13) Strategic infrastructure	There could be conflict between the strategic objectives that relate to housing delivery, infrastructure and employment sites and this IAA objective due to potential for development of greenfield sites and agricultural land. This will be dependent on the site developed.	Policies should seek to make the best use of brownfield sites through maximising densities where suitable and appropriate.
4) Energy / CC mitigation	1) Housing Delivery 2) Affordable Housing 8) Retain, enhance employment 10) Retail, culture leisure 12) Support tourism	There could be conflict between the strategic objectives that relate to housing delivery, employment, retail and tourism and this IIA objective due to potential for an increase in energy consumption resulting from an increased population, increased businesses and visitor facilities, and new developments.	Policies should seek to minimise greenhouse gas emissions through incorporation of energy efficient design features and support for incorporation of low/zero carbon sources of energy.
5) Water management / CC adaptation	1) Housing Delivery 2) Affordable Housing 8) Retain,	There could be conflict between the strategic objectives that relate to housing delivery, employment, retail and	Policies should specify how development should be resilient to the impacts of climate change and should promote sustainable resource use. Policies should

	<p>enhance employment</p> <p>10) Retail, culture and leisure</p> <p>12) Support tourism</p>	<p>tourism and this IIA objective due to the potential for an increase in demand for water, contribution towards urban heat island effect resulting from increased development and the potential for increased flood risks.</p>	<p>take into account the risk of various types of flooding and seek to minimise flood risk.</p>
6) Landscape & Character	<p>1) Housing Delivery</p> <p>2) Affordable Housing</p> <p>4) Community Infrastructure</p> <p>8) Retain, enhance employment</p> <p>13) Strategic infrastructure</p>	<p>There could be conflict between the strategic objectives for housing delivery, infrastructure and employment and this IIA objective due to potential for impacts on the SDNP and settlement patterns resulting from development. This will be dependent on what is delivered, how it is delivered and the site developed.</p>	<p>Policies should seek to protect landscape character and promote high quality and sensitive design.</p>
7) Built Environment	<p>No potential conflicts have been identified.</p>		
8) Historic Environment	<p>1) Housing Delivery</p> <p>2) Affordable Housing</p> <p>4) Infrastructure</p> <p>8) Retain, enhance employment</p>	<p>There could be conflict between the strategic objectives for housing delivery, infrastructure and employment and this objective due to potential for impacts on heritage assets. This will be dependent on what is delivered, how it is delivered and the site developed.</p>	<p>Policies should seek to enhance and preserve the historic built environment and promote high quality and sensitive design.</p>
9) Healthy Lifestyles	<p>1) Housing Delivery</p> <p>2) Affordable Housing</p> <p>8) Retain, enhance employment</p>	<p>Although housing and employment are both wider determinants of health, this IIA objective is more focused on healthy, active lifestyles. There could therefore be conflict between the strategic objectives for housing delivery and employment and this IIA objective due to potential for increased demand on existing facilities, including open space resulting from an increased population. In addition, there is potential for conflict between the need to develop sites for housing or employment uses and the need to protect sites for open space</p>	<p>Policies and site selection will need to strike the correct balance in terms of meeting competing needs.</p>

		uses, which will compete with each other and will need to be delivered within a finite space.	
10) Crime & Safety	No potential conflicts have been identified.		
11) Housing	8) Retain, enhance employment 15) Protect green space, coastline, natural environment	There could be conflict between the strategic objectives for enhancement and provision of employment sites and protection of greenspace and the natural environment and this IIA objective. This is due to the need to develop sites for housing, the need to retain existing and provide new sites for employment uses and the need to protect greenspace, all of which will compete with each other need to be delivered within a finite space.	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.
12) Communities	No potential conflicts have been identified.		
13) Education	1) Housing Delivery 2) Affordable Housing	There could be conflict between the strategic objectives for housing delivery and this IIA objective due to potential for increased pressure on school infrastructure resulting from an increased population. There may also be competition for sites between different uses.	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure including education provision.
14) Economy	1) Housing Delivery 2) Affordable Housing	There could be conflict between the strategic objectives for housing delivery and this IIA objective due to the need to develop sites for housing and the need to provide new sites for employment uses, both of which need to be delivered within a finite space.	Policies and site selection will need to strike the correct balance in terms of meeting competing needs and allowing and enabling economic growth.
15) Town & Local Centres	1) Housing Delivery 2) Affordable Housing	There could be conflict between the strategic objectives for housing delivery and this IIA objective due to potential for increased pressure on existing services resulting from an increased population.	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure.
16) Travel &	No potential		

Access	conflicts have been identified.		
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4.3.4 Conflicts between competing concerns and land uses such as new development and the protection of the environment are always likely to arise. Further detailed assessments at the planning application stage should help to ensure that these concerns are adequately balanced.

### Key Findings from the HIA

4.3.5 Table 3 identified those objectives that are of relevance to the SEA Directive 'Human Health' topic and subsequently applicable to the HIA component of this IIA. The fundamental IIA objectives in relation to human health are objective 9: Healthy Lifestyles, objective 10: Crime and Public Safety and objective 12: Communities.

4.3.6 With regards to IIAO9, it is evident that the majority of the strategic objectives of the Draft Worthing Local Plan are compatible with this objective. However, the assessment has shown that there are some potential conflicts between this objective and SO1: Housing, SO2: Affordable Housing and SO8: Employment Sites. Whilst housing and employment are both wider determinants of health and thereby providing good quality housing and provision of employment opportunities will help to address existing health inequalities, this has to be considered against the context of the potential loss of open space to meet demand for housing and employment. There is potential for conflict between the need to develop sites for housing or employment uses and the need to protect sites for open space uses, which will compete with each other and will need to be delivered within a finite space.

4.3.7 With regards to IIAO10 (Crime and Safety) and IIAO12 (communities) no potential conflicts have been identified with the strategic objectives of the Draft Worthing Local Plan.

4.3.8 Potential conflicts have also been found between a number of strategic objectives and those IIA objectives that are considered to have an indirect relationship on human health. It is considered that further detailed assessments at the planning application stage (i.e. HIA) should help to ensure a proper assessment of potential conflicts, and where appropriate, identify any suitable mitigation measures.

### Key Findings from the EqIA



- 4.3.9 It is considered that SEA Directive topics ‘population’ and ‘human health’ (which overlaps with the HIA component) are of most relevance to the EqIA component of this IIA.
- 4.3.10 The fundamental IIA objectives pertaining to population are IIAO9: Healthy Lifestyles, IIAO10: Crime and Public Safety, IIAO11: Housing, IIAO12: Communities, IIAO13: Education and IIAO14: Economy. IIAO9, IIAO10 and IIAO12 have been considered in paragraphs 4.3.6-4.3.8 above.
- 4.3.11 With regards to IIAO11 (housing), it is evident that the majority of the strategic objectives of the Draft Worthing Local Plan are compatible with this objective. However, the assessment has shown that there are some potential conflicts between this and SO8: Employment Sites and SO15: Green Space, Coastline & Natural Environment. This is due to the need to develop sites for housing, the need to retain existing and provide new sites for employment uses and the need to protect greenspace, all of which will compete with each other need to be delivered within a finite space. However, it is considered that Local Plan policies and site selection will need to strike the correct balance in terms of meeting competing needs.
- 4.3.12 Potential conflicts have been identified between IIAO13 (education) and SO1: Housing Delivery and SO2: Affordable Housing as it is considered that there is potential for increased pressure on school infrastructure resulting from an increased population. Therefore Local Plan policies should seek to ensure adequate and timely provision of necessary supporting infrastructure including education provision.
- 4.3.13 With regards to IIAO14 (Economy), it is considered that there is potential for conflict with SO1: Housing Delivery and SO2: Affordable Housing due to the need to develop sites for housing and the need to provide new sites for employment uses, both of which need to be delivered within a finite space. Therefore Local Plan Policies and site selection will need to strike the correct balance in terms of meeting competing needs and allowing and enabling economic growth.
- 4.3.14 Potential conflicts have also been found with a number of strategic objectives and those IIA objectives that are considered to have an indirect relationship on population. It is considered that further detailed assessments at the planning application stage (i.e. HIA / EqIA) should help to ensure a proper assessment of potential conflicts, and where appropriate, identify any suitable mitigation measures.

## 4.4 Appraisal of Sites

4.4.1 All the available sites identified through the SHLAA, “calls for sites” and the ‘Your Town Your Future’ consultation have been tested through the site criteria developed as part of the SA framework (Appendix C). The appraisal of potential sites has been undertaken to inform the site selection process in the Local Plan.

4.4.2 An overall rating for each site was reached based on the following classification:

Red, significant constraints. It is unlikely that a site could be developed without a significant negative effect;
Yellow, mixed or some negative constraints. The site could potentially be developed but mitigation is likely to be required;
Green, minimal constraints or there are benefits associated with developing the site.

**Table 8: Overview of Sites Appraisal**

SA Objective	Indicator	Stagecoach Site, Marine Parade	Grafton Site	Union Place South	Teville Gate	British Gas Site, Lyndhurst Road	Martlets Way	Decoy Farm
Environmental Quality	Worthing Air Quality Management Area (AQMA)	Y	Y	Y	Y	Y	Y	R
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	G	G	G	G	G	G	Y
	Noise	G	G	Y	Y	G	Y	Y
Biodiversity	Sites, Habitats and Species	G	G	G	G	G	G	Y
Land and Soils	Potentially Contaminated Land	Y	G	Y	Y	R	R	R
	Agricultural Land	G	G	G	G	G	G	G
Water	Flooding from	R	R	G	G	G	G	Y

Management	Rivers and Sea							
	Surface Water (awaiting maps)	G	G	G	R	G	G	R
	Groundwater	G	G	G	R	Y	G	R
Landscape and Character	Setting of SDNP	G	G	G	G	G	G	G
	Coalescence	G	G	G	G	G	G	Y
	Undeveloped coastline and countryside	G	G	G	G	G	G	Y
Built Environment	Derelict sites	Y	Y	G	G	G	G	R
Historic Environment	Designated Heritage Assets	R	Y	Y	Y	G	G	G
	Archaeology	R	G	Y	G	R	G	Y
Healthy Lifestyles	Accessible open space, sport and leisure	G	R	G	G	G	G	G
Crime and Public Safety	Indices of Multiple Deprivation	Y	Y	Y	R	Y	G	Y
Communities	Proximity to doctor's Surgeries	G	G	G	G	G	G	Y
	Proximity to Libraries	G	G	G	G	G	G	G
Education	Proximity to	G	G	G	G	G	G	G

	primary schools (infant, junior)							
	Proximity to secondary schools	G	Y	G	G	G	G	G
Economy	Key office location or industrial estate	R	G	Y	R	G	G	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	G	G	G	G	G	G	Y
Travel and Access	Proximity to train station	Y	Y	G	G	G	G	G
	Proximity to cycle routes	G	G	G	G	G	G	Y
<b>Conclusion</b>		Y	Y	G	Y	G	G	Y

SA Objective	Indicator	HMRC offices, Barrington Road	Centenary House	Civic Site (Stoke Abbott Rd)	Land North of Beeches Avenue	Worthing United Football Club, Beeches Avenue	Land South of Upper Brighton Road
Environmental Quality	Worthing Air Quality Management Area (AQMA)	Y	Y	Y	R	R	R
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	G	G	G	R	R	R
	Noise	Y	Y	Y	G	G	Y
Biodiversity	Sites, Habitats and Species	G	G	G	Y	Y	Y
Land and	Potentially	Y	G	G	G	G	G

Soils	Contaminated Land						
	Agricultural Land	G	G	G	R	R	R
Water Management	Flooding from Rivers and Sea	G	G	G	G	G	G
	Surface Water (awaiting maps)	R	G	G	G	R	Y
	Groundwater	Y	G	G	G	G	R
Landscape and Character	Setting of SDNP	G	G	G	Y	Y	Y
	Coalescence	G	G	G	G	G	Y
	Undeveloped coastline and countryside	G	G	G	Y	Y	R
Built Environment	Derelict sites	Y	Y	Y	R	R	R
Historic Environment	Designated Heritage Assets	G	Y	Y	G	G	Y
	Archaeology	G	R	R	Y	Y	Y
Healthy Lifestyles	Accessible open space, sport and leisure	G	G	G	G	R	G
Crime and Public Safety	Indices of Multiple Deprivation	G	Y	Y	G	G	G
Communities	Proximity to	G	R	R	Y	Y	Y

	doctor's Surgeries						
	Proximity to Libraries	G	G	G	Y	Y	G
Education	Proximity to primary schools (infant, junior)	G	G	G	G	G	G
	Proximity to secondary schools	G	G	G	G	G	G
Economy	Key office location or industrial estate	R	G	G	Y	G	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	G	G	G	Y	Y	Y
Travel and Access	Proximity to train station	G	G	G	Y	Y	Y
	Proximity to cycle routes	G	G	G	Y	Y	Y
<b>Conclusion</b>		Y	Y	Y	Y	R	Y

SA Objective	Indicator	Goring Ferring Gap	Chatsmore Farm	Caravan Club, Titnore Way	Land West of Fulbeck Avenue	Land East of Titnore Road	Land at Dale Road
Environmental Quality	Worthing Air Quality Management Area (AQMA)	Y	Y	Y	Y	Y	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	G	Y	G	G	G	Y
	Noise	G	Y	G	G	G	Y

Biodiversity	Sites, Habitats and Species	Y	Y	Y	Y	Y	Y
Land and Soils	Potentially Contaminated Land	G	G	G	G	G	R
	Agricultural Land	R	R	R	R	R	G
Water Management	Flooding from Rivers and Sea	Y	Y	G	G	G	Y
	Surface Water (awaiting maps)	R	R	Y	R	G	Y
	Groundwater	Y	R	Y	Y	Y	Y
Landscape and Character	Setting of SDNP	R	R	G	Y	R	Y
	Coalescence	R	R	G	G	G	R
	Undeveloped coastline and countryside	R	R	Y	Y	Y	R
Built Environment	Derelict sites	R	R	R	R	R	R
Historic Environment	Designated Heritage Assets	Y	Y	Y	G	Y	G
	Archaeology	G	R	G	G	G	G
Healthy	Accessible open	R	G	G	R	G	G

Lifestyles	space, sport and leisure						
Crime and Public Safety	Indices of Multiple Deprivation	G	G	Y	Y	Y	G
Communities	Proximity to doctor's Surgeries	Y	Y	Y	Y	Y	Y
	Proximity to Libraries	Y	Y	Y	Y	Y	Y
Education	Proximity to primary schools (infant, junior)	Y	Y	G	G	G	G
	Proximity to secondary schools	G	G	Y	Y	Y	G
Economy	Key office location or industrial estate	G	G	G	G	G	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	Y	Y	G	G	G	G
Travel and Access	Proximity to train station	G	G	Y	Y	Y	G
	Proximity to cycle routes	G	G	G	G	G	G
<b>Conclusion</b>		R	R	Y	Y	Y	R

4.4.3 The full results of this appraisal can be found in Appendix D1.

4.4.4 It should be noted that at this stage no schemes or options are being assessed. All sites have been tested with no assumptions being made on the type or nature of development. This will be considered through the testing of Local Plan policy options for potential site allocations. Therefore constraints are scored negatively even though it is acknowledged that in some cases a



scheme could bring enhancements. However, it is not considered appropriate at this stage to make an assumption whether a scheme would deliver an enhancement or benefit. As evidence studies are produced, this assessment will be revisited. Therefore it is possible that the individual and overall scores of sites may change following the publication of further evidence such as the proposed update to the Strategic Flood Risk Assessment that will support the Local Plan.

4.4.5 Of all the sites tested three have been given an overall rating of green. These are:

- Union Place South;
- British Gas Site Lyndhurst Road;
- Martlets Way;

Although these sites have potentially contaminated land which will require remediation, they are vacant brownfield sites in highly sustainable locations or within the town centre with little or no other constraints.

4.4.6 Four sites have been given an overall rating of red. These are:

- Worthing United Football Club, Beeches Avenue;
- Goring Ferring Gap;
- Chatsmore Farm;
- Land at Dale Road (undeveloped part of Brooklands Park);

4.4.7 The Worthing Landscape and Ecology Study (2017) concluded that development at Goring Ferring Gap, Land at Dale Road and the majority of Chatsmore Farm (excluding the south western corner) would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between settlements, the setting to existing settlement or the South Downs National Park.

4.4.8 Throughout the appraisal a number of sites were scored 'red' against various criteria. The recommendations of evidence studies will need to be considered and options tested to determine the extent to which it is possible to mitigate these.

## 4.5 Appraisal of Options

- 4.5.1 In-line with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present an appraisal of “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” whilst in-line with Schedule 2(8) there is a need to explain “the reasons for selecting the alternatives dealt with.
- 4.5.2 The guidance states that a range of options should be identified and considered at an early stage in the Local Plan making process. These should be reasonable, realistic, deliverable and sufficiently distinct to enable meaningful comparisons to be drawn. The following options do not meet these requirements and have therefore been scoped out:

**Table 9: Options Scoped Out**

**Do Nothing**

The sustainability appraisal for the Worthing Core Strategy considered a ‘do nothing’ option which would result in a reactive land use decision making system as opposed to a planned framework.

The existing Development Plan for Worthing is the Worthing Core Strategy which was adopted in 2011. The intention was that this document would help to guide development in the Borough until 2026. However, since its adoption central government has changed the planning system which has had many implications for local authorities, particularly in how housing needs are addressed and cross boundary matters are considered. Without a new Local Plan there is a risk that the Council would lose a degree of local control of planning matters as the likelihood of speculative development proposals would increase.

It is a statutory requirement to have a Local Plan in place so on this basis it is considered that ‘Do Nothing’ is not a realistic option.

**Building out to sea**

Development in Worthing is constrained by a lack of land due to the sea to the south and the South Downs National Park to the north.

One option to meet local development needs would be to reclaim land from the sea. The option of building out to sea was considered through a study conducted by Royal Haskoning in 2007 which concluded that the only scenario that would provide sufficient financial return to make the project viable would require intensive development that would have little or no relation to the existing urban character or form. It was estimated that such a scheme would have a major impact on local infrastructure. There has since been no further evidence or proposals to suggest that this would now be viable.

4.5.3 For those alternatives that are realistic and deliverable there is a need to compare all reasonable alternatives including the preferred approach to clearly identify the significant positive and negative effects of each alternative.

4.5.4 Table 10 below identifies where reasonable alternatives have been identified. The conclusions on the overall sustainability of the different alternatives are given, and the reasons for selecting the preferred approach in light of the alternatives. The full appraisal can be found in Appendix D2. Appendix D2 also includes the findings from the HIA and the EqIA.

**Table 10: Draft Local Plan Policies**

Policy	Summary	Options	Appraisal Findings	Preferred Approach
SP1: Presumption in favour of sustainable development	To integrate the 'presumption' into the Worthing Local plan to ensure the Local Plan contributes to sustainable development.	None identified		
SP2: Spatial strategy	To maximise appropriate development.	<p>Option 1: Brownfield only</p> <p>Option 2: Brownfield land and sustainable urban extensions</p>	<p>Option 1 scores as having positive effects across a number of environmental objectives. However, this needs to be balanced against negative scores for housing, economy, town and local centres and water management reflecting how this option will reduce the number of potential sites for development. There are also a number of neutral effects concerning communities and education.</p> <p>Option 2 scores positively across the majority of social and economic objectives. A number of negative environmental effects have been identified associated with development of greenfield sites.</p>	<p>Overall option 2 scores more positively due to the larger number of potential sites and the opportunities this brings to meet the widest range of needs by enabling a greater mix of uses to be accommodated across a variety of sites.</p> <p>It is recommended that environmental evidence is considered when selecting appropriate sites for development.</p>

SP3: Development sites	Sets a housing figure and a minimum amount of employment floorspace to be provided	<p><i>Given the highly constrained nature of the borough, no options have been identified for setting the employment floorspace target.</i></p> <p>Option 1: Need led approach: This option aims to meet local housing need by assuming all available sites will be allocated for residential development at high densities.</p> <p>Option 2 Supply led approach: This option assumes all available sites will be allocated for development at an appropriate density to deliver housing and where suitable a mix of uses.</p> <p>Option 3: Evidence led approach: 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.</p>	<p>The high densities required in Option 1 would result in very negative effects in terms of biodiversity and landscape and character. This option 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 level of housing, the densities required may impact on the type and mix of housing provided. However, there is a positive effect for crime and safety.</p> <p>Option 2 scores positively for housing, built environment, crime, 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. There is a neutral impact on healthy lifestyles.</p> <p>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. There is a neutral impact on healthy lifestyles.</p>	<p>Option 3. This option is likely to result in less significant negative impacts and represents the most balanced approach to meeting competing demands.</p> <p>The appraisal identifies potential negative effects for biodiversity, water management and housing. It recommends that mitigation and opportunities for green infrastructure identified in the landscape study should be implemented as part of developments. In addition other policies in the Plan should seek to ensure suitable minimum densities to make the most efficient use of land whilst delivering a mix of uses, deliver a net gain in biodiversity, create protect and enhance green infrastructure networks, ensure the use of Sustainable Drainage Systems, require water efficiency measures and deliver adequate public open space.</p>
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SP4: Countryside and undeveloped coast	Designates land outside of the Built Up Area Boundary as countryside and undeveloped coast to protect landscape and coastal character including its environmental and recreational value	<p>None identified. The overall impact of this policy is assessed as part of the total effects.</p> <p>The option of protecting or allocating individual sites for development is assessed below.</p>		
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SP5: Local Gaps	<p>Designates land as Local Gap to preserve Worthing's character and prevent coalescence.</p> <p><i>The overall impact of this policy is assessed as part of the total effects. The option to allocate or protect individual sites is tested in this table below.</i></p>	<p>The suitability of specific sites and the extent to which they form Local Gap has been informed by the landscape evidence. This recommends that the following sites are designated as Local Gap:</p> <p>Option 1: Chatsmore Farm</p> <p>Option 2: Goring Ferring Gap</p>	<p>Option 1 has very positive effects on landscape &amp; character and built environment objectives through its primary purpose of maintaining separation between settlements and preventing coalescence. There are also other positive effects including on healthy lifestyles and economy through the indirect impacts of preserving the land in its current undeveloped state. It should be noted that there are very negative impacts associated with resisting development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated.</p> <p>Option 2 has very positive effects when scored against landscape and character and historic environment reflecting the benefits of maintaining separation between settlements. There are also multiple other positive impacts including on healthy lifestyles and communities. It should be noted that there are very negative impacts associated with resisting</p>	<p>All these options have an overall positive or neutral impact however it is recognised that Chatsmore Farm and Goring Ferring Gap score stronger due to the additional positive effects identified relating to the historic environment.</p>
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		<p>Option 3: Brooklands Recreation Area and abutting allotments</p> <p>Option 4: Land east of proposed development (site A3) at Upper Brighton Road</p>	<p>development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated. In relation to HIA/EqIA this option has very positive effects when scored against healthy lifestyles and communities reflecting the benefits of maintaining separation between settlements.</p> <p>Option 3 has very positive effects associated with landscape &amp; character and the built environment objectives due the primary purpose of the Local Gap maintaining separation between settlements. There are also positive effects for communities and healthy lifestyles reflecting the benefits of maintaining separation between settlements. Negative effects are identified against the housing and economy objectives due to the potential loss of land for development however given that most of this site is currently in use as a park, the area that would be available is limited to the north western corner. Other objectives are rated as neutral recognising the indirect benefits in terms of protecting this area of existing open space.</p> <p>The scoring of Option 4 reflects the compact nature of this site and that it will ultimately form part of the wider gap alongside designations to the east in Adur. This option has multiple positive benefits including for communities reflecting its contribution to protecting the Gap as a whole and preventing</p>	
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			<p>coalescence. It scores negative due to the lack of housing that potentially could have been delivered here in addition to the allocation on the remainder of the site. There is a neutral impact for healthy lifestyles as designating this part of the site as Local Gap will have no direct impact given the small size of the site.</p>	
SP6: Local Green Space Designation	<p>Designates land as Local Green Space to protect green areas of particular importance to the local communities they serve.</p> <p><i>The overall impact of this policy is assessed as part of the total effects. The option of protecting or allocating individual sites for development is assessed below.</i></p>	<p>The sites designated were identified through community engagement and interest. The decision as to whether they are suitable and meet the criteria for Local Green Space designation has been informed by evidence.</p> <p>Option 1: Goring Ferring Gap</p> <p>Option 2: Chatsmore Farm</p>	<p>Option 1 has very positive effects in terms of biodiversity, historic environment, landscape &amp; character, healthy lifestyles and communities reflecting the reasons the site is valued. This is balanced against a very negative effect for housing and a negative effect for economy objectives reflecting the level of protection given by the designation which will restrict most development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.</p> <p>Option 2 scores less positively than the other two but still has very positive effects against landscape &amp; character and communities objectives and a positive effect against healthy lifestyles reflecting the aspects the community values. This is balanced against a very negative effect for housing and a negative effect for economy objectives reflecting the level of protection given by the designation which will restrict most development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.</p>	<p>All these sites score positively overall and should be designated as Local Green Space in the Local Plan.</p>

		Option 3: Brooklands Recreation Area	Option 3 has very positive effects in terms of biodiversity, healthy lifestyles and communities it also has a positive effect against the landscape & character objective reflecting the reasons the site is valued by the local community. This is balanced against negative effects for housing and economy objectives reflecting the level of protection given by the designation which will restrict most development but acknowledging that as most of the site is in use as formal recreation it is unlikely to become available for development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.	
PA1: Goring Ferring Gap	Protects this site from inappropriate development using SP4: Countryside and Undeveloped Coast, SP5: Local Gaps and SP6: Local Green Space Designation.	<p>Option 1: Protecting the site</p> <p>Option 2: Allocating the site for development.</p>	<p>Option 1 scores as having very positive effects against the landscape &amp; 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.</p> <p>Option 2 scores as having very positive effects for housing which has to be balanced against very negative effects on the landscape &amp; character objective. This</p>	The option to protect the site from inappropriate development is considered to be the most sustainable scoring positively overall. This is despite a very negative effect associated with the loss of housing delivery, which it is not considered possible to mitigate



			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.	
PA2: Chatsmore Farm	Protects this site from inappropriate development using SP4: Countryside and Undeveloped Coast, SP5: Local Gaps and SP6: Local Green Space Designation.	<p>Option 1: Protecting the site.</p> <p>Option 2: Allocating the whole site for development.</p> <p><i>The landscape study identifies the option of developing in the south west corner which it identifies as being less sensitive. However this option has been screened out as</i></p>	<p>Option 1 has very positive effects against the landscape &amp; 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.</p> <p>Option 2 has very negative effects against the landscape &amp; 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</p>	The option to protect the site from inappropriate development is considered to be the most sustainable scoring positively overall. This is despite a very negative effect associated with the loss of housing delivery, which it is not considered possible to mitigate.

		<i>there is currently no realistic means of access to this part of the site.</i>	recognising the benefits of delivering housing in a highly sustainable location.	
PA3: Brooklands Recreation Area	Protects this site from inappropriate development using SP4: Countryside and Undeveloped Coast, SP5: Local Gaps and SP6: Local Green Space Designation.	<p>Option 1: Retaining the north west portion of the site (known as Dale Road) and protecting the site.</p> <p>Option 2: Allocating the north west portion of the site (known as Dale Road) for development.</p> <p><i>Given the current use of Brooklands Park (excluding the Dale Road area) as a park and the recent investment, improvements and community engagement in future enhancements, the allocation of this site for development is not considered a reasonable option.</i></p>	<p>Option 1 scores very positively for communities and landscape &amp; 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</p> <p>Option 2 to allocate the part of the site known as Dale Road scored positively for economy, housing and land &amp; 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 &amp; 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.</p>	<p>The option to protect the site is the most sustainable option overall. The option to protect the site excluding the north western corner (known as Dale Road) was not tested however the appraisal of allocating that part of the site shows it has very negative effects associated with the sensitivity of the site in terms of landscape and character.</p> <p>Opportunities should be promoted to expand the Park and recreation area into the north west portion of the site currently inaccessible to maximise benefits to the local community.</p>

A1: Caravan Club	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A2: Land West of Fulbeck Avenue	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A3: Upper Brighton Road	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.  The portion of land adjacent to the east of this site is designated under Policy SP5 as Local Gap. It is not considered that it is reasonable to consider including this within the allocation area as it form the easement strip for cables for the Rampion wind farm and is therefore unsuitable for development.		
A4: Decoy Farm	The site is considered to be 'deliverable'. This means that it is viable, available and	None identified. The evidence suggests that the site is deliverable and suitable for development consisting of industrial uses.		

	offers a suitable location for development.	Given the local need for employment floorspace it is not considered a reasonable alternative to not allocate the site.		
A5: Teville Gate	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A6: Union Place South	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A7: Grafton	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A8: Civic Centre Car Park	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC1: Centenary House	The site is considered to be	None identified. The evidence suggests that the site		

	suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	is suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC2: British Gas Site, Lyndhurst Road	The site is considered to be suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	None identified. The evidence suggests that the site is suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC3: Stagecoach, Marine Parade	The site is considered to be suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	None identified. The evidence suggests that the site is suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC4: Worthing Leisure Centre	The site is considered to be suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	None identified. The evidence suggests that the site is suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC5: HMRC Offices, Barrington Rd	The site is considered to be suitable for development but	None identified. The evidence suggests that the site is suitable for development. Given the local housing need it is not		

	there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	considered a reasonable alternative to not allocate the site.		
AOC6: Martlets Way	The site is considered to be suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	None identified. The evidence suggests that the site is suitable for development. Given the local need for employment floorspace and the existing use of the site it is not considered a reasonable alternative to not allocate the site.		
OS1: Land east of Titnore Lane	The site has been omitted from the Plan. The evidence suggests the site is not suitable for development.	None identified. The evidence suggests there are constraints that cannot be overcome and the site is therefore not suitable for development.		
OS2: Land north of Beeches Avenue	The site has been omitted from the Plan. The evidence suggests the site is not suitable for development.	None identified. The evidence suggests there are constraints that cannot be overcome and the site is therefore not suitable for development.		
OS3: Worthing United Football Club	The site has been omitted from the Plan. The evidence suggests the site is not suitable for development.	None identified. The evidence suggests there are constraints that cannot be overcome and the site is therefore not suitable for development.		
CP1: Housing Mix & Quality	To deliver a wide choice of quality homes by planning for a mix of housing.	Option 1: Require developments to meet the optional higher Building Regulations standard M4(2) for Accessible and Adaptable dwellings where feasible and viable and for	Option 1 scores very positively in terms of the benefits to the health and well-being of individuals and communities by enabling people to remain in their homes for longer, and improving the quality and	Option 1: This option scores most positively due to the benefits for the community and health and well-being of the widest range of

		<p>10% of homes on major developments to meet Building Regulations requirement M4(3) wheelchair user dwellings.</p> <p>Option 2: Expect Applications to comply with the optional higher standard M4(2) only.</p> <p>Option 3: Continue to rely on current Building Regulations standards.</p>	<p>choice of housing available to those with mobility issues or requiring housing accessible for wheelchair users. However there are a number of uncertain and neutral scores which recognise the potential that this may conflict with site constraints and the potential impact on viability.</p> <p>Option 2 scores positively in terms of the benefits to the health and well-being of individuals and communities by enabling people to remain in their homes for longer. This would particularly affect older people although would also support those with mobility issues. However the scoring also recognises the potential impact on viability and consequently housing delivery due to increased build costs</p> <p>Option 3 scores fairly neutral compared with the baseline however in the longer term this may place greater demand for specialist housing as the population ages if existing homes cannot be adapted. It results in a negative effect on healthy lifestyles as this may place greater demand for specialist housing as the population ages if existing homes cannot be adapted</p>	<p>individuals. Although it is recognised that this may increase the cost of building homes, this is outweighed by the social benefits.</p> <p>Policy wording should ensure that these requirements only apply where feasible and viable to reduce some of the identified potential negative and uncertain impacts. The impact of this policy on viability should be tested.</p>
CP2: Density	<p>Promote an effective use of land.</p> <p>This Policy also sets minimum densities as required by the</p>	Option 1: Require new dwellings to meet the minimum nationally described space standards and local standards for external space.	Option 1 brings the most positive benefits in terms of people's health and well-being, and communities. However it is also recognised that there may be a risk in terms of viability that could impact delivery of smaller sites and affordable housing.	Option 1: Subject to viability testing, this scores more positively due to its impact in terms of reducing health inequalities and helping to support stable communities.

	revised NPPF. Alternative minimum densities would not be sufficiently distinct to draw comparisons and therefore no reasonable alternatives have been identified.	Option 2: Not setting minimum space standards	Option 2 scores negatively as without minimum space standards homes may not always be a sufficient size to support health and well-being. This is likely to specifically impact those on lower incomes exacerbating health inequalities. However this option does score positive in so far as it is recognised that on some sites not having minimum space standards may enable additional dwellings to be delivered.	
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CP3: Affordable Housing	Deliver an appropriate type and tenure of affordable housing.	This policy is in accordance with the Written Ministerial Statement and revised NPPF in only seeking affordable housing on sites providing 10 homes or greater. No reasonable alternatives have been identified  The proportion and types of affordable housing required were identified through the Housing study. No reasonable alternatives have been identified.		
CP4: Gypsy and Traveller and Travelling Showpeople	Set criteria by which relevant applications will be assessed.	None identified		
CP5: Quality of the Built Environment	Seeks to ensure high quality design.	None identified		
CP6: Public Realm	Deliver enhancements to the public realm	None identified		
CP7: Healthy Communities	Promote healthy communities and seek a reduction in	None identified		



	health inequalities			
CP8: Open Space, Recreation and Leisure	Ensure adequate open space is provided and protect existing	None identified		
CP9: Planning for Sustainable Communities / Community Facilities	Protect and support improvements to community facilities	None identified		
CP10: Delivering Infrastructure	Plan positively for infrastructure.	None identified		
CP11: Economic Growth and Skills	Support a strong and diverse local economy and local employment skills.	None identified		

CP12: Protecting and Enhancing Existing Employment Sites	Encourage provision of new employment premises and sites	<p>Option 1: Protect key industrial estates, business parks and office locations.</p> <p>Option 2: Avoid the long term protection of employment sites allowing a more flexible approach.</p>	<p>Option 1 would support local economic growth bringing very positive effects for the local economy. The safeguarding of local jobs also brings positive effects for local communities and may contribute to a reduction in health inequalities as well as supporting the town and local centres. However it is recognised that protecting employment sites may negatively impact housing delivery. In addition the appraisal has highlighted negative effects should employment uses on a site become redundant resulting in vacant properties.</p> <p>Option 2 scores positively in terms of enabling a more flexible approach to uses which may help ensure a more effective use of land. However it scores very negatively due to the potential loss of employment space to non employment</p>	<p>Option 1: This option scores more positively overall and is therefore the most sustainable.</p> <p>To mitigate the potential negative effects resulting from vacant properties, wording should be included in the policy to allow the release of those sites that are genuinely redundant or vacant for long periods. In addition consideration should be given to the use of Article 4 Directions to ensure this policy is effective.</p>
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			uses, reducing employment opportunities within the Plan area. This consequently also scores negatively due to the potential loss of jobs which may increase local unemployment and exacerbate health inequalities.	
CP13: The Visitor Economy	Support and enhance visitor attractions and accommodation.	None identified		
CP14: Retail and Main Town Centre Uses	Support the vitality and viability of town centres.	<p>Option 1: Increase in flexibility: The Retail Study recommended a change in boundary to some shopping areas which would result in a reduction in the area within which only retail uses would be allowed and an increase in the area within which wider uses would be encouraged. It also recommended increased flexibility within District Centres.</p> <p>Option 2: Retain existing approach</p>	<p>Option 1 scores as having positive effects against social and economic objectives with no negative effects identified.</p> <p>Option 2 scores as having neutral effects overall against social and economic objectives</p>	Option 1 allowing greater flexibility scores more positively overall and is therefore the most sustainable.
CP15: A Strategic Approach to the Historic Environment	Protect and enhance the historic environment and heritage assets.	None identified		
CP16: The Historic Environment	Protect and enhance the historic environment and heritage assets.	None identified		
CP17: Sustainable Design	Mitigate and adapt to climate change	Option 1a Require optional higher Building Regulations standard on	Option 1a brings very positive impacts in terms of the environment, climate change	Options 1a and 2a bring more positive effects and are

		water efficiency	<p>adaption and communities. However it is acknowledged that there may be cost implications which could impact the delivery of housing particularly on smaller sites. There is no link between this option and healthy lifestyles.</p> <p>Option 1b brings mostly neutral effects including for communities reflecting that there is no change from the baseline situation. There is no link between this option and other HIA/EqIA relevant objectives including healthy lifestyles, crime and public safety, housing, education and economy.</p>	<p>the most sustainable options.</p> <p>To mitigate potential negative effects, both of these options should be informed by viability testing to understand and potential impact on housing delivery and the policy wording for option 2a should also include an allowance for historic buildings recognising that in some cases the energy efficiency measures needed to reduce carbon emissions may not be appropriate.</p>
		<p>Option 1b Rely on current standards.</p> <p>Option 2a. Require minimum sustainability standards (including carbon emissions, energy efficiency standards and BREEAM rating)</p> <p>Option 2b. Rely on current standards.</p>	<p>Option 2a brings very positive effects in terms of energy, healthy lifestyles and communities due to the potential lower energy costs. However there are potential negative effects due to the impact on historic buildings and viability for smaller sites. Mitigation has been identified which should be incorporated within the Local Plan.</p> <p>Option 2b to rely on current standards brings mostly neutral effects including against the communities objective reflecting that it presents no change to the baseline situation. Therefore comparatively it is likely to bring fewer benefits in terms of climate change mitigation but equally less potential to negatively impact on housing delivery due to viability. There is no link between this option and healthy lifestyles, crime and public safety, housing, education and economy.</p>	

CP18: Energy	Support development of renewable, low carbon or decentralised energy schemes.	None identified		
CP19: Biodiversity	Protect and enhance biodiversity achieving net gains.	None identified		
CP20: Green Infrastructure	Encourage the creation and enhancement of a green infrastructure network and assets	None identified		
CP21: Flood Risk and Sustainable Drainage	Ensure flooding from all sources is safely managed, not increased and reduced overall.	None identified		
CP22: Water Quality and Protection	Protect and enhance water quality.	None identified		
CP23: Pollution and Contamination	Prevent development from contributing to our being put at risk from unacceptable levels of pollution.	None identified		

## 4.6 Total, Cumulative and Synergistic Effects

- 4.6.1 Total effects are all of the Local Plan's effects. The sustainability appraisal should identify describe and evaluate the likely significant effects. The likely total effects across the Draft Worthing Local Plan policies on each of the appraisal objectives are shown below in Table 11. The full appraisal of the Draft Local Plan can be found in Appendix D3.
- 4.6.2 The SEA Directive also requires an assessment of cumulative and synergistic effects. Cumulative effects are important because the plan itself may not have a significant effect, but when added to other actions its effects may be significant and require additional mitigation. Synergistic effects are a subset of cumulative effects, where effects interact to produce a total effect greater than the sum of the individual effects. These often happen as habitats, resources or communities get close to capacity. Synergistic effects are assessed as part of the cumulative effects assessment.
- 4.6.3 Part 1 of the Draft Local Plan does not contain any policies. Therefore the appraisals below relate only to Parts 2, 3 and 4 of the Draft Plan. Policy SP1: Presumption in Favour of Sustainable Development has not been subject to this appraisal as it is a model policy recommended for inclusion by PINS and therefore any SA findings would do little by way of influencing the policy.

**Table 11: Total Effects of the Draft Local Plan**

Objective 1. Environmental Quality																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
Part 2					Part 3															Part 4																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
S P 2	S P 3	S P 4	S P 5	S P 6	A 1	A 2	A 3	A 4	A 5	A 6	A 7	A 8	A O C 1	A O C 2	A O C 3	A O C 4	A O C 5	A O C 6	O S 1	O S 2	O S 3	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 0	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 

<b>HIA/EqIA</b>	This objective has no direct relationship with the HIA / EqIA.																																													
<b>Cumulative</b>	The expansion of the AQMA suggests that air quality issues were worsening due to a combination of increased levels of traffic congestion and the growth in popularity of diesel vehicles. However following this an Air Quality Action Plan is in place and a local partnership has been established to coordinate actions to improve air quality, on a wider scale vehicle emissions are also expected to reduce. However, the scale of development proposed in the Local Plan may have the potential to negatively impact on these efforts. It is not possible to determine the extent of this in terms of whether the impact will be sufficient to reduce the level of improvement that may have otherwise been achieved, or prevent an improvement altogether. However it should be acknowledged that without the Local Plan development is still likely to come forward through windfall sites but without the mitigation provided through the policies in the Draft Plan. In terms of synergistic effects it is recognised that although air quality impacts on environmental quality, it has a far greater impact on health.																																													
<b>Objective 2. Biodiversity</b>																																														
<b>Part 2</b>					<b>Part 3</b>													<b>Part 4</b>																												
<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>	<b>S</b>								<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>																													
<b>P</b>	<b>P</b>	<b>P</b>	<b>P</b>	<b>P</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>O</b>	<b>O</b>	<b>O</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>C</b>						
<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>0</b>					
/	-	+	+	+	-	-	-	-	0	0	0	0	0	0	0	0	0	0	-	-	/	0	0	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	0	0
<b>Conclusions</b>					Part 3 scores negatively reflecting the potential impact of development however this is addressed through other policies in Parts 2 and 4 of the Plan which score positively and Policy CP19 which scores as having very positive effects.																																									
<b>HIA/EqIA</b>					This objective has no direct relationship with the HIA / EqIA.																																									
<b>Cumulative</b>					Wider legislation commits to protecting and enhancing biodiversity including through growing a resilient network and providing net gains. The Draft Local Plan will further support this and help identify opportunities for enhancement and delivery of net gains on the proposed development sites.																																									

Objective 3. Land and Soils																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
Part 2					Part 3															Part 4																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
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Objective 5. Water Management																																																
Part 2					Part 3													Part 4																														
S P 2	S P 3	S P 4	S P 5	S P 6	A 1	A 2	A 3	A 4	A 5	A 6	A 7	A 8	A O C 1	A O C 2	A O C 3	A O C 4	A O C 5	A O C 6	O S 1	O S 2	O S 3	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 10	C P 11	C P 12	C P 13	C P 14	C P 15	C P 16	C P 17	C P 18	C P 19	C P 20	C P 21	C P 22	C P 23	C P 24	C P 25		
-	-	0	0	+	+	+	0	+	+	+	+	0	0	0	+	+	0	0	?	0	0	?	0	0	+	0	0	/	?	0	+	0	0	0	0	0	0	0	+	0	0	+	+	+	0	0	0	
Conclusions					Part 2 scores negatively overall highlighting that development is likely to increase demand for water resources. Part 3 scores positively including where sites are at a risk of flooding as the policy wording seeks to direct development to areas of lowest flood risk and incorporate SuDS. Part 4 also scores positively overall across a range of policies which seek to address flood risk and demand for water.																																											
HIA/EqIA					This objective has no direct relationship with the HIA / EqIA.																																											
Cumulative					Worthing is at a significant risk of flooding from surface water. Flooding is likely to increase in intensity and frequency as a result of climate change. Although the total effects of the Plan score positively the Plan overall will likely increase the number of properties at risk, particularly from surface water flooding. In addition even with measures within the Plan to improve water efficiency the demand for water as a result of the Plan is likely to increase overall in an area classified as 'Serious Water Stress' which may exacerbate the effects of climate change.																																											
Objective 6. Landscape and Character																																																
Part 2					Part 3													Part 4																														
S P 2	S P 3	S P 4	S P 5	S P 6	A 1	A 2	A 3	A 4	A 5	A 6	A 7	A 8	A O C 1	A O C 2	A O C 3	A O C 4	A O C 5	A O C 6	O S 1	O S 2	O S 3	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 10	C P 11	C P 12	C P 13	C P 14	C P 15	C P 16	C P 17	C P 18	C P 19	C P 20	C P 21	C P 22	C P 23	C P 24	C P 25		
+	?	+	+	+	-	-	-	-	0	0	0	0	0	0	0	0	0	0	-	-	-	0	0	0	0	+	0	0	+	0	?	0	0	0	0	+	+	0	+	0	0	0	0	0	0	0	0	0
Conclusions					Part 2 of the Plan scores positive with Policy SP5 having very positive effects due to its intention to prevent coalescence. Part 3 scores negatively due to the potential impact of developing undeveloped sites; this is addressed through other policies in Part 4. Part 4 scores positively across a number of housing, communities, heritage, and environment policies.																																											
HIA/EqIA					This objective has no direct relationship with the HIA / EqIA.																																											



Cumulative	There is a need to maintain and enhance the high quality natural landscape. The Draft Local Plan alongside the emerging South Downs National Park Local Plan will help protect the character and setting of the National Park, undeveloped coast and important views between settlements. Indirectly this may also impact on healthy lifestyles through the protection and provision of open space.																																															
Objective 7. Built Environment																																																
Part 2					Part 3													Part 4																														
S P 2	S P 3	S P 4	S P 5	S P 6	A 1	A 2	A 3	A 4	A 5	A 6	A 7	A 8	A O C 1	A O C 2	A O C 3	A O C 4	A O C 5	A O C 6	O S 1	O S 2	O S 3	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 10	C P 11	C P 12	C P 13	C P 14	C P 15	C P 16	C P 17	C P 18	C P 19	C P 20	C P 21	C P 22	C P 23	C P 24	C P 25		
+	0	0	0	0	0	0	0	0	+	+	+	+	0	+	+	0	0	0	0	0	0	0	+	0	0	0	+	+	+	+	0	+	0	0	0	0	0	+	+	0	0	0	+	0	0	0	0	0
Conclusions					Where policies are relevant there are a mix of positive and very positive effects across all parts of the Plan these are most strongly associated with the allocation of brownfield sites and design policies. However links are also identified between the achievement of this objective and the historic environment objective.																																											
HIA/EqIA					This objective has no direct relationship with the HIA / EqIA.																																											
Cumulative					The Draft Local Plan will help secure good design in terms of layout, buildings and public realm. This will complement and could support delivery of identified public realm improvement projects.																																											
Objective 8. Historic Environment																																																
Part 2					Part 3													Part 4																														
S P 2	S P 3	S P 4	S P 5	S P 6	A 1	A 2	A 3	A 4	A 5	A 6	A 7	A 8	A O C 1	A O C 2	A O C 3	A O C 4	A O C 5	A O C 6	O S 1	O S 2	O S 3	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 10	C P 11	C P 12	C P 13	C P 14	C P 15	C P 16	C P 17	C P 18	C P 19	C P 20	C P 21	C P 22	C P 23	C P 24	C P 25		
0	?	0	+	+	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	?	/	0	+	0	?	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0
Conclusions					Policies in Part 4 of the Plan that relate to the historic environment score as having very positive effects, as do the policies for sites which contain or are located close to heritage assets. Policies also score positively that relate to landscape and character due to protection of historic views between settlements highlighting a link between this and the landscape & character objective.																																											
HIA/EqIA					This objective has no direct relationship with the HIA / EqIA.																																											

Cumulative	The number of heritage assets at risk has decreased. The Draft Local Plan should preserve and enhance the historic environment.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
Objective 9. Healthy Lifestyles																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
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SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AO1	AO2	AO3	AO4	AO5	AO6	O1	O2	O3	C1	C2	C3	C4	C5	C6	C7	C8	C9	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25	CP26	CP27	CP28	CP29	CP30	CP31	CP32	CP33	CP34	CP35	CP36	CP37	CP38	CP39	CP40	CP41	CP42	CP43	CP44	CP45	CP46	CP47	CP48	CP49	CP50	CP51	CP52	CP53	CP54	CP55	CP56	CP57	CP58	CP59	CP60	CP61	CP62	CP63	CP64	CP65	CP66	CP67	CP68	CP69	CP70	CP71	CP72	CP73	CP74	CP75	CP76	CP77	CP78	CP79	CP80	CP81	CP82	CP83	CP84	CP85	CP86	CP87	CP88	CP89	CP90	CP91	CP92	CP93	CP94	CP95	CP96	CP97	CP98	CP99	CP100																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
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EqlA	Policy CP7: Healthy Communities score positively against this objective in the recognition of the need to provide high quality homes within an attractive environment. It is considered that the provision of high quality homes will help to address local housing need and thereby support EqlA protected characteristics ‘age’, ‘disability’ and ‘race’.																																																			
Cumulative	Within the wider area a number of Authorities are unable to meet their local housing need figure. The shortfall left by the Worthing Local Plan will further exacerbate this potentially impacting on affordability issues and the ability of local residents to find suitable accommodation.																																																			
Objective 12. Communities																																																				
Part 2						Part 3												Part 4																																		
SP2	SP3	SP4	SP5	SP6		A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25	CP26	CP27	CP28	CP29	CP30
+	?	0	+	+		0	0	0	0	0	0	0	+	+	0	0	+	0	0	0	0	?	+	0	0	/	0	0	+	+	+	+	+	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0	+			
Conclusions						There are very positive effects identified against this objective with Policies SP6, A8 and AOC4 due to the new or enhanced community facilities and services they will provide.																																														
HIA/EqlA						Policies CP1, CP7 – CP11 score positively against this objective. It is considered that these policies will provide social benefits for communities through the provision of new housing, ensuring healthy communities, safeguarding open space and recreation, safeguarding community facilities and the provision of new social infrastructure. These policies will support the EqlA protected characteristics.																																														
Cumulative						Data suggests that people living at higher densities in Worthing compared to surrounding areas and resident numbers are growing. There are also a high proportion of people over the age of 60 and within the borough there are wards with significant deprivation resulting in inequalities. The Draft Local Plan may place additional pressure on local services and facilities; however it may also provide opportunities in some areas to provide new local facilities.																																														
Objective 13. Education																																																				
Part 2						Part 3												Part 4																																		
SP2	SP3	SP4	SP5	SP6		A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25	CP26	CP27	CP28	CP29	CP30
/	?	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0			
Conclusions						Policies SP2 and SP3 in Part 2 of the Plan highlight potential neutral and uncertain effects associated with the impact of development on																																														

	existing facilities. This is addressed through Part 4 of the Plan where policies CP9, CP10 and CP11 will protect and support the provision of new education and training facilities.																																														
EqlA	Policies SP2 and SP3 in Part 2 of the Plan highlight potential neutral and uncertain effects associated with the impact of development on existing facilities. This is addressed through Part 4 of the Plan where policies CP9, CP10 and CP11 will protect and support the provision of new education and training facilities and thereby support EqlA protected characteristics 'age', 'disability' and 'race'.																																														
Cumulative	There is relatively low educational attainment and skills in Worthing particularly in the more deprived areas. The 2011 census results show that Worthing had the third highest unemployment rate in West Sussex however these numbers appear to be reducing. The Draft Local Plan will protect existing and support the provision of new education and training facilities																																														
Objective 14. Economy																																															
Part 2					Part 3															Part 4																											
S P 2	S P 3	S P 4	S P 5	S P 6	A 1	A 2	A 3	A 4	A 5	A 6	A 7	A 8	A O C 1	A O C 2	A O C 3	A O C 4	A O C 5	A O C 6	O S 1	O S 2	O S 3	C P 1	C P 2	C P 3	C P 4	C P 5	C P 6	C P 7	C P 8	C P 9	C P 10	C P 11	C P 12	C P 13	C P 14	C P 15	C P 16	C P 17	C P 18	C P 19	C P 20	C P 21	C P 22	C P 23	C P 24	C P 25	
/	+	-	-	-	/	0	0	+	+	+	+	+	+	?	+	?	/	+	0	-	0	0	0	0	0	0	0	0	0	+	0	+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	+
Conclusions					Part 2 of the Plan has mixed scores with policy SP3 scoring positively due to the commitment for additional employment floorspace, conflicting with policies SP4 to SP6 which seek to protect important areas of open space restricting the land available for new economic growth. Part 3 of the Plan scores positively with very positive effects identified for those sites allocated for mixed use schemes including new commercial floorspace. The relevant policies in Part 4 of the Plan also score positively with policy CP11 scoring as having very positive effects.																																										
EqlA					Policy CP7: Healthy Communities score positively against this objective. The policy seeks to improve the provision of and / access to employment in recognition of the clear links between income and health. This will support the EqlA protected characteristics 'age', 'disability' and 'race'.																																										
Cumulative					Wider strategies including the Adur & Worthing Growth Deal, Coastal West Sussex Economic Plan (2016-2020) and the Adur & Worthing Economic Strategy (2018-2023) set out to achieve growth, boost economic performance and help improve productivity and wages which are currently lower than elsewhere in the South East. The Local Plan will help ensure that whilst land is constrained where appropriate development will also deliver new commercial floorspace for new or expanding businesses. However despite the Local Plan there may still be a loss of offices as a result of Permitted Development Rights.																																										

Objective 15. Town and Local Centres																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
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	Worthing and Lancing. Initial proposals were consulted on in 2017. If the A27 improvement plan is implemented the Draft Local Plan will complement this by improving access to sustainable modes of transport, however if it is not implemented the transport study that supports the Local Plan has concluded that the scale of development proposed would not significantly worsen congestion.
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- 4.6.4 Overall the Draft Local Plan scores positively against the majority of the appraisal objectives, with no negative scores overall. The Draft Plan scores as uncertain overall against the education objective reflecting that the Plan does not allocate any sites for new education facilities. In addition the Plan scores overall as neutral against the environmental quality and water management objectives. In relation to environmental quality this recognises that despite the measures included in the plan to protect the environment and reduce pollution, the proposed development is likely to generate additional traffic. Equally in relation to water management although the Plan seeks to reduce water use from new developments and mitigate flood risk there is still likely to be an overall demand for water as a result of the Plan and it is likely that additional properties will be built in areas at risk of flooding particularly in relation to surface water.
- 4.6.5 In relation to cumulative and synergistic effects, potential negative effects are identified in relation to energy, water management and housing due to the likelihood of the Draft Local Plan either exacerbating existing trends, projections or in the case of housing further adding to the shortfall across the local area. Potential neutral effects are identified in relation to Environmental Quality and Travel and Access objectives highlighting the concern that the additional development included in the Draft Local Plan may minimise the positive effect of other measures being implemented to improve air quality. In relation to this issue a synergistic effect was also identified in terms of the impact of air quality on health. In relation to the Communities objective the cumulative effects are rated as uncertain. This is primarily due to the current trend of growing resident numbers and an increase in the proportion of people over the age of 60 which may place additional pressures on local services and facilities. At this stage it is unclear what the impact of the Local Plan will be in terms of both exacerbating this and providing new facilities to alleviate pressures.

## 4.7 Recommendations

4.7.1 Mitigation of significant negative effects and enhancement of positive effects are a key purpose of SA/SEA. The following section details the mitigation measures recommended by this appraisal. At later stages this will also document whether the proposed measures have been incorporated into the plan and, if not, why.

4.7.2 Where required, in identifying mitigation, the mitigation hierarchy has been followed which sets that avoidance is better than reduction, which in turn is better than offsetting.

**Table 12: Mitigation**

Policy / Topic	Recommendation
Review of Objectives	Policies should seek to reduce the need to travel by car, promote and enable sustainable forms of travel, should specify how resources should be used sustainably and should seek to reduce various forms of pollution.
	Policies should seek to protect and enhance biodiversity and encourage the incorporation of multi-functional biodiverse design features.
	Policies should seek to make the best use of brownfield sites through maximising densities where suitable and appropriate.
	Policies should seek to minimise greenhouse gas emissions through incorporation of energy efficient design features and support for incorporation of low/zero carbon sources of energy.
	Policies should specify how development should be resilient to the impacts of climate change and should promote sustainable resource use. Policies should take into account the risk of various types of flooding and seek to minimise flood risk.
	Policies should seek to protect landscape character and promote high quality and sensitive design.
	Policies should seek to enhance and preserve the historic built environment and promote high quality and sensitive design.
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.
	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure including education provision.
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs and allowing and enabling economic growth.
	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure.
SP2 Spatial Strategy	The policy could be more explicit in specifically promoting new employment uses as part of development.
AOC1 Centenary House	High quality redevelopment and improved public realm within this prominent site could provide a positive outcome when assessed against the Built Environment objective.
AOC4 Worthing Leisure Centre	
AOC5 HMRC Offices, Barrington Road	
CP1 Housing Mix and Quality	Policy wording should ensure that accessibility standards only apply where feasible and viable to reduce some of the identified potential negative and uncertain impacts.
CP2 Density	The impact of imposing minimum space standards on viability should be



	considered.
CP7 Healthy Communities	The positive effects could be maximised by making specific reference to reducing pollution
CP12 Protecting and Enhancing Existing Employment Sites	To avoid the potential negative effects resulting from vacant properties, wording should be included in the policy to allow the release of those sites that are genuinely redundant or vacant for long periods.
CP17 Sustainable Design	This policy should be informed by viability work to understand the potential impact on the delivery of smaller sites. It should also include allowances for historic buildings as some measures to reduce emissions may not be appropriate.

## **Part 5: What are the next steps?**

### **5.1 Consultation**

- 5.1.1 Consultation on the Draft Worthing Local Plan and this Draft IIA Report will be from 31 October until 5pm on 12 December 2018. Representations will be reviewed and considered. Depending on the issues raised, the Local Plan may then be amended.
- 5.1.2 Any significant changes to the Local Plan will require further appraisal. A further round of consultation may also be required. If so, an updated IIA report will be prepared to reflect these changes and accompany the Local Plan.
- 5.1.3 Following this, the Pre-Submission version of the Local Plan will be published for final comment on the 'soundness' of the plan. Again, an updated IIA report will be prepared to accompany the Local Plan during consultation.

### **5.2 Proposed Monitoring Framework**

- 5.2.1 It is a requirement of the SEA Directive that the significant effects of a plan or programme are monitored.
- 5.2.2 The monitoring will be undertaken on an annual basis, where possible, and will be incorporated into the wider annual monitoring and presented in the Annual Monitoring Report for Worthing Borough Council. There may be some indicators which cannot be measures annually, and these will be monitored according to the timescales which are appropriate. Where relevant, the reporting will show where a situation has improved, stayed the same, or become worse, compared to the previous year's data.
- 5.2.3 Draft monitoring arrangements will be developed and included in the next version of this Report that will accompany the Proposed Submission Local Plan. The final monitoring arrangements will be confirmed in the Sustainability Statement that will be produced after the Local Plan is adopted.

**Worthing Borough Council**  
**Planning Policy**  
**Portland House**  
**44, Richmond Road**  
**Worthing**  
**West Sussex**  
**BN11 1HS**



**WORTHING BOROUGH**  
**COUNCIL**



# **WORTHING BOROUGH COUNCIL**

## **DRAFT INTEGRATED IMPACT ASSESSMENT**

### **Technical Appendices**

**Regulation 18**

**October 2018**



**Draft Integrated Impact Assessment Report  
Technical Appendices**

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B: Responses to Scoping Report

C: Site Specific Criteria

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D2: Options Appraisal

D3: Appraisal of Draft Local Plan

E: Habitats Regulations Assessment Screening

## APPENDIX A: LEGAL AND POLICY BACKGROUND

### SEA DIRECTIVE REQUIREMENTS

Information required in the Environment Report	Section in the SA Report
Preparation of an environmental report in which likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is:	This SA report meets this requirement.
1. An outline of the contents, main objectives of the plan or programme	The background to, vision and strategic objectives of the Local Plan are included in Section 2.2. The SA objectives are included in Section 2.5.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	A summary of baseline information collected during the scoping stage, as updated is included in Section 2.4. "The likely evolution without implementation of the Local Plan" has been considered and is included in Section 2.5.
3. The environmental characteristics of areas likely to be significantly affected.	Baseline information collected during the scoping stage is summarised in Section 2.4.
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	A summary of baseline information collected during the scoping stage, as updated is included in Section 2.4. From this the key sustainability problems / issues are identified in Section 2.5.
5. The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 2.2 outlines the policy context of the Local Plan and Section 2.3 outlines the sustainability context including relevant sustainability objectives.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 4 summarises the appraisal findings. The full results are included in Appendix D – Appraisals.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Mitigation measures are discussed throughout Sections 4 and where relevant Appendix D.
8. An outline of the reasons for selecting the alternatives dealt with, and a	A description of reasonable alternatives considered is covered in Section 4 of

Information required in the Environment Report	Section in the SA Report
description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	this report.
9. A description of measures envisaged concerning monitoring in accordance with Article 10.	The proposed indicators to monitor the effects will be set out in the final SA Report to accompany the proposed submission version of the Local Plan.
10. A non-technical summary of the information provided under the above headings.	This will be provided in a separate document.

## SEA CONSULTATION REQUIREMENTS

SEA Directive consultation requirements	Where covered in the SA process
1. Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report.	The Consultation Bodies along with stakeholders in relation to Equalities Impact Assessment and Health Impact Assessment were consulted on the SA Scoping Report for a five week consultation period in March 2015. They were subsequently reconsulted on a revised SA framework and methodology for five weeks in March 2016.
2. Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.	This draft report accompanies the draft Local Plan for public consultation.
3. Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.	Not applicable.
4. Taking the environmental report and the results of the consultations into account in decision-making.	All representations received during consultation will be taken into account in later stages of the preparation of the Local Plan and SA.
5. When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed: 6. The plan or programme as adopted 7. A statement summarising how environmental considerations have been integrated into the plan or programme 8. The measures decided concerning monitoring.	These requirements will be considered and acted upon once the Local Plan is adopted
9. Monitoring of the significant environmental effects of the plan's or programme's implementation.	The significant effects of the Local Plan will be monitored when adopted. The proposed monitoring arrangements will be outlined in the SA Report to accompany the Proposed Submission Local Plan. These may be amended and will be finalised in the SEA Post Adoption Statement.



## APPENDIX B: RESPONSES TO SCOPING REPORT

Scoping Report Consultation 16 March to 20 April 2015

Responder	Comments	Response
Historic England	Generic advice letter provided which includes advice on all aspects of the SA Scoping.	Update.
Natural England	The baseline information and the appraisal framework appear to provide a sound basis for proceeding with all key issues identified.	n/a
Natural England	We welcome the recognition of the urban area's importance to the relationship of the South Downs National Park and the coast.	n/a
Natural England	We would expect close working with the National Park Authority in the development of the Plan and the SDNP Management Plan should be heavily referenced and also cited in the relevant strategic documents section of this Scoping Report.	Update.
Natural England	You should also refer to the South Coast Plain National Character Area profile which contains a broad range of useful information about the area (in either the regional, sub-regional or local section of the documents list).	Update.
Natural England	The East Head to Shoreham section of England's Coastal Path is due to be completed during 2015/16. Although, in practice, this may not affect proposals in the Worthing plan as there is already good access, it may be worth mentioning as it will provide additional opportunities for promotion of tourism and benefits for health and wellbeing.	Update.
Environment Agency	Pleased to see that the scope considers the key issues and topics related to our remit, in particular water quality and resources including the water framework directive, flood risk, biodiversity, contaminated land and waste.	n/a
Environment Agency	We are pleased to see that the topics within your SA include both Climate Change Adaption and Flood Risk and Climate Change Mitigation and Energy.	n/a
Environment Agency	<i>5. Climate Change Adaptation and Flood Risk:</i> The text makes reference to the main studies and strategies that have been developed with regard to flood risk. However, we would also recommend reference to the West Sussex Local Flood Risk Management Strategy.	Update.
Environment Agency	<i>15. Water:</i> This section makes reference to the Catchment Abstraction Licensing Strategy. For clarity we would recommend further explanation as to what is meant by the term "water not available for licensing". This scenario highlights water bodies where flows are below the indicative flow requirement to help support Good Ecological Status (as required by the Water Framework Directive). No new consumptive licences for abstraction will therefore be permitted in this water body.	Update.
Environment Agency	Para 15.4 sets out the projection that under the requirements of the Water Framework Directive there is likely to be an improvement in water quality. Whilst this is the intention we would highlight that in order for these improvements to be made we need to work with partners and key stakeholder and we would consider that local authorities are central to this.	Noted.

Environment Agency	We would also recommend that this section refers to water stress. The Environment Agency and Natural Resources Wales published updated classifications of areas of water stress in England and Wales in July 2013. These updated those previously published in 2007. The new methodology identifies areas of serious water stress where: (a) the current household demand for water is a high proportion of the current effective rainfall which is available to meet that demand; or (b) the future household demand for water is likely to be a high proportion of the effective rainfall available to meet that demand. The primary purpose of this classification is to provide evidence to support universal metering proposals in certain areas. However, it is recognised that the information can also be applied to encourage or support high water efficiency measures in new build, or to support retrofitting initiatives. It also states that even in those areas designated "not in serious water stress" under the new methodology, there should be some activity to ensure that water is used more efficiently and effectively. Worthing Borough Council sits within an area of serious water stress.	Update.
Environment Agency	We support the sustainability objectives and supporting criteria that have been identified within the SA framework.	n/a
Environment Agency	Objective 1 – the supporting criteria could be made more specific in relation to water quality by making specific reference to not only ensuring no deterioration but also whether it will contribute to achieving good ecological status or potential as requirement under the Water Framework Directive.	Incorporated.
Environment Agency	Objective 3 – whilst we note that water efficiency measures are included in the supporting criteria for Objective 4 due to the link between water efficiency and energy efficiency we would recommend that a criteria is also included in this objective. Hot water use in the home can produce up to 25% of the domestic carbon.	Incorporated.
Environment Agency	We are pleased to see that relevant Environment Agency documents have been included in this list, notably Groundwater Protection: Policy and Practice (GP3), the South East River Basin Management Plan and associated River Adur Catchment Plan, and the relevant flood management strategies have been included. Please note that there is a current consultation on the draft update to the South East River Basin Management Plan which closes this Friday. The final version of the updated Plan will be published in December 2015. We would recommend that this is referenced in the Scoping Report and as more information becomes available this is incorporated in to the SA/SEA process.	Update.
Environment Agency	The Code for Sustainable Homes has been included in the list of PPPSI's. Whilst in the main document you have highlighted the current Government's Housing Standards Review we would recommend that this is also referred to in this section.	Update.
WSCC Public Health	Overall this shows a robust and systematic approach, which should ultimately help to reduce inequalities within the borough.	n/a
WSCC Public Health	Table 6 objective 11 – Improving Education is also going to be dependent on family stability and support both before and during the child's years at school.	Noted.
WSCC Public Health	Your increasing and ageing population will inevitably lead to increasing numbers of people with multi long term medical conditions.	Noted.
WSCC Public Health	The increase in air pollution as a result of increasing population and industrial growth and resulting increase in traffic will also detrimentally affect people's health particularly those with long term medical conditions.	Noted.

WSCC sustainability team	Overall, there are a number of areas that could be expanded on – a number of areas that have been amalgamated, when they would be better addressed separately (e.g. water, waste).	Noted.
WSCC sustainability team	In all sections, it would also be helpful to provide some potential indicators of success. These will help to illustrate the potential scope of the process and can also be used to inform the assessment process.	Noted.
WSCC sustainability team	It is considered that 'Environmental Quality' is restricted; no mention has been made of noise or other pollutants other than traffic.	Noted.
WSCC sustainability team	In terms of biodiversity, could the plan look to ensure a net gain, rather than ensuring no net loss?	Noted.
WSCC sustainability team	There is also an opportunity to ensure greater community engagement, which will help deliver other biodiversity objectives. If Landscape Character and Historic Environment are to be combined, it is suggested that the links to community, education and the economy are recognised.	Incorporated.
WSCC sustainability team	Climate change adaptation is only really discussed in terms of flooding. More detail could be added regarding drought and adaptation to increased incidence of periods of hot, dry weather. This could equally appear in the Health section and also links to the Air Quality section.	Incorporated.
WSCC sustainability team	In the Climate change mitigation section there is no reference to the role of energy generation from renewables. There is some concern regarding grouping waste and climate change mitigation in the same area. Whilst it is true that there are significant links, not all Sustainable Waste Management actions will mitigate climate change and vice versa.	Noted.
WSCC sustainability team	Regarding infrastructure, it is considered that there is a need to further highlight the importance of reducing the need to travel, rather than purely promoting infrastructure. The role of sustainable transport in environmental quality, climate change mitigation, (health), communities, (economy), Town Centre, Infrastructure it is considered is underplayed.	Noted.
WSCC sustainability team	Lastly when considering communities, there are opportunities to tackle fuel poverty under this topic area.	Update.
WBC Housing Officer	Overall you make reference to the 'demand through the register continues to exceed supply' but should more explicit mention be made of the income to house price ratio and general affordability issue for so many?	Incorporated.
WBC Housing Officer	para 10.4: perhaps worth mentioning that the 'significant need for family housing' is exacerbated by the low turnover of affordable properties	Update.
WBC Housing Officer	10.5: please replace elderly with older	Noted.
WBC Environmental Health Officer	I refer to Chapter 3 on Air Quality: It is important that other areas of the Borough are not excluded. There are some areas around the Borough that are close to exceeding the national objectives. It is also important to ensure that new areas of poor air quality are not created by inappropriate development. Therefore maybe a new section 3.5 to say <i>It is important that other areas of the Borough are not overlooked. Monitoring around the Borough shows that other areas need to be kept under observation to ensure they do not exceed the national objectives. Inappropriate development could result in additional AQMA's being declared at other locations.</i>	Update.

WBC Environmental Health Officer	3.6 Issues: Traffic congestion is prevalent along main road networks ( <i>not just the A27</i> ). Reference should be made to the continued popularity of biomass boilers. These produce particulates (PM10 and PM2.5) that can have a detrimental effect on health. Furthermore they risk an exceedance of the national objectives for particulates, so large concentrations of such boilers could cause air quality issues.	Update.
WBC Environmental Health Officer	3.7: Appropriate design and mitigation can also affect air quality.	Noted.
WBC Planning Policy	There are 11 ind/bus estates in Worthing not 8.	Update.
WBC Planning Policy	Employment sites out of town not reduced by 60% just reduced.	Update.

Further consultation on revised SA Framework and methodology 7 March to 15 April 2016

Environment Agency	I have reviewed the document and am pleased to see that the scope considers the key issues and topics related to our remit, in particular water quality and resources including the water framework directive, flood risk, biodiversity, contaminated land and waste.	Noted
Environment Agency	<b>Objective 1</b> The wording of the revised supporting criteria for Objective 1 'seek opportunities to improve surface, coastal and ground water quality' could be made more specific in relation to water quality. In the previous draft we were consulted on back in April 2015 the supporting criteria stated 'Ensure no deterioration of water quality and promote opportunities to improve the quality of ground, surface and coastal waters'. We suggested the supporting criteria could make specific reference to not only ensuring no deterioration but also whether it will contribute to achieving good ecological status or potential as a requirement under the Water Framework Directive	Incorporated.
Environment Agency	<b>Objective 2</b> We support the inclusion of the supporting criteria for Objective 2 seeking to 'Achieve net gain in biodiversity locally'.	Noted.
Environment Agency	<b>Objective 3</b> We also support the inclusion of objective 3 for Land and Soils and the reference to remediation of contaminated land.	Noted.
Environment Agency	<b>Objective 5</b> We note the inclusion of the Objective 5 - Water Management. This includes 'Direct development to areas of lowest flood risk, taking account of future flood risk and sea level rise' within the supporting criteria.	Noted.
Natural England	While we welcome the aspiration to avoid disturbance to protected species, the commitment to refuse development within 200m of records of protected species seems a little over-ambitious! I suggest altering to "Within 200m of records of SIGNIFICANT POPULATIONS OF protected species" and/or "habitats known to support protected species".  Impact Risk Zones for designated sites reflect the sensitivity of these sites to a variety of pressures. Note that Cissbury Ring SSSI may be affected by significant development well beyond the 200m boundary.	Review site criteria.
Natural England	We recognise that the area has limited opportunity to increase the amount of priority habitats; however, it would be useful to have the Scoping Report's aspiration of no net loss reflected in the Framework. This is particularly relevant for irreplaceable habitat such as the area's ancient woodland.	Incorporated.

Natural England	We note that the area has 3 Local Geological sites (RIGS) (Cote Bottom, Charmandean Quarry & Gaster Pit 7, Sompting) which are not mentioned in the Scoping Report or Framework.	Update.
Natural England	The preparation of England's Coastal Path National Trail is set to begin in this area later this year. This represents opportunities to enhance a number of key objectives, such as access to nature, tourism, health and well-being and this could be referenced.	Update.
Historic England	<i>No response received</i>	

*No responses were received on the SA Scoping Report during the Worthing Local Plan Issues and Options Consultation 11 May to 22 June 2016.*

## APPENDIX C: SITE SPECIFIC CRITERIA

SA Objective	Indicator	Criteria	Justification
Environmental Quality	Worthing Air Quality Management Area (AQMA)	R = Within or in close proximity to the AQMA	The Worthing AQMA runs from Grove Lodge Roundabout to Lyons Farm. The AQMA is an area where air quality is already or expected to exceed national standards. The primary cause is as a result of traffic congestion. This criterion focuses on the potential for sites to further negatively impact air quality within the Worthing AQMA. In addition, development within or in close proximity to the AQMA will place future occupants in an area of poor air quality and therefore has potential to negatively impact on their health and wellbeing.
		Y = Sites with the potential to increase congestion in and around the AQMA	
		G = Not likely to affect congestion in the AQMA	
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	R = Within a Source Protection Zone	It is important that groundwater quality is protected as it is an important resource for drinking water supply and in supporting surface water flows and wetland ecosystems. Source Protection Zones indicate where drinking water supplies are particularly sensitive to pollution. These zones may restrict the types of development that are appropriate. The Water Framework Directive (WFD) requires all designated waterbodies to achieve good ecological status or potential and to ensure no deterioration. In Worthing, there are 2 WFD waterbodies, with the Ferring Rife being classed as 'good' and the Teville Stream classed as 'bad'. Development could potentially pose a risk to the quality of a waterbody, although it can also present opportunities to improve or enhance a failing waterbody.
		Y = Has the potential affect a WFD Waterbody	
		G = Not located in a Source Protection Zone or likely to affect a WFD Waterbody	
	Noise	R = Road or rail noise exceeding 75 dB(A)	In Worthing the key sources of noise are from roads and rail. The Planning Noise Advice Document: Sussex (2015) report indicates that a noise report is unlikely to be required when average noise levels from road noise fall below 55 dBA LAeq16hr.
		Y = Road or rail noise exceeding 55 dB(A)	
		G = Not within an area identified as experiencing significant road or rail noise	
Biodiversity	Sites, Habitats and Species	R = Within or likely to impact internationally (SAC, SPA, Ramsar) or nationally (SSSI,	Biodiversity should be protected and enhanced ensuring no net loss and seeking to provide net gains where possible. There are no internationally (SAC, SPA Ramsar) or nationally (SSSI, National

		National Nature Reserves, National Parks) designated sites	Nature Reserves, National Parks) designated sites within the Plan area. As none of the sites are within or likely to impact internationally or nationally designated sites, no sites will be scored red. For the purposes of this assessment, any potential for significant effects on the South Downs National Park are assessed separately under the landscape objective below.
		Y = Sites containing or likely to impact locally (designated sites, UK BAP Priority habitats and legally protected species	
		G = Sites that do not meet the above criteria	
Land and Soils	Potentially Contaminated Land	R = Significant levels of contamination expected due to previous or historic uses on the site	Indicates the presence of potentially contaminated land due to previous and historic uses on the site. It is important that potentially contaminated land is investigated and remediated where necessary to make the site safe to its end users and to protect controlled waters. Contaminated land is likely to be a constraint to development resulting in additional costs. However, development of potentially contaminated land also brings opportunities to remediate contaminated land, improving the quality of soils and controlled waters.
		Y = Potentially contaminated land (PCL)	
		G = Non - potentially contaminated land (PCL)	
	Agricultural Land	R = Grade 1-3 agricultural land	To help protect high quality agricultural land and prioritise redevelopment of previously developed land. The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non food crops for future generations. Local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
		Y = Grade 3-5 agricultural land	
		G = Non agricultural or urban land	
Energy	Energy use and waste	Not possible to assess this against sites until options are being appraised. Therefore this objective will not be assessed as part of the initial appraisal of sites	
Water Management	Flooding from Rivers and Sea	R = Flood Zone 3	Indicates which sites are located within Flood Zones thereby indicating the probability of flooding from rivers and the sea. Development should be directed first to those sites at lowest flood risk. Where only a small part of a site is identified as being within a Flood Zone the site has been scored based on what flood zone the majority of the site is in.
		Y = Flood Zone 2	
		G = Flood Zone 1	
	Surface Water (awaiting maps)	R = The area has a high chance of flooding from surface water (greater than 3.3%)	The updated Flood Map for Surface Water was produced by the Environment Agency in 2013. The map shows that significant areas of Worthing are at flood risk from surface water. The Local Flood

		Y = The area has a medium chance of flooding from surface water (1% to 3.3%)	Risk Management Strategy (West Sussex County Council, 2013) recognises Worthing as a priority 'Wet Spot' with 8,750 properties at risk from surface water flooding. Surface water therefore contributes significantly to the flood risk in Worthing due to the urban nature of the area and the drainage being compromised by high tides, groundwater or blockages.
		G = The area has a low (0.1% - 1%) or very low (less than 0.1%) chance of flooding from surface water	
	Groundwater	R = The area is considered to be at a high risk (greater than 50%) of groundwater flooding	The Adur and Worthing Strategic Flood Risk Assessment (SFRA) 2012 report contains a map of Areas Susceptible to Groundwater Flooding which shows what percentage of a 1 km area is susceptible to groundwater flood emergence. Worthing is positioned at the base of the South Downs and has suffered flooding from groundwater in the past. The majority of the Worthing area is susceptible to groundwater flooding.
		Y = The area is considered to be at a medium risk (25% - 50%) of groundwater flooding	
	G = The area is considered to be at a low risk (less than 25%) risk of groundwater flooding		
	Water resources	As the whole area is located in an area of serious water stress this would not show any distinction between sites.	
Landscape and character	Setting of South Downs National Park	R = Considered to form part of the setting of the National Park or has the potential to significantly impact on key views to or from the Park	A key landscape consideration will be the impact of development on the setting of or key views to or from the South Downs National Park. The Plan area excludes the National Park however sites could impact on its setting or key views. The Worthing Landscape Ecology Study 2017 (incorporating the 2015 study, addendum 2017, further review of sites 2017 and combined summary 2017) assessed the suitability for development of potential edge of town sites in terms of their visual sensitivity and contribution to the setting of 'outstanding assets'.
		Y = Considered to make only a limited contribution to the setting of or views to or from the National Park	
		G = Site is within core urban area and is unlikely to impact on the setting of or views to or from the National Park	
	Coalescence	R = Development of the site would impact on the visual or physical separation between settlements	Maintaining separation between settlements is important to protect their identity and character. The majority of Worthing Borough occupies the coastal plain with the only breaks in an almost continuous band of urban development along the coast at the far eastern and western ends of Worthing. The Worthing Landscape and Ecology Study 2017 (See above) assessed the suitability for
	Y = Forms part of the separation between settlements but is detached from the gap		



		G = Forms no visual or physical separation between settlements	development of potential edge of town sites in terms of their contribution to separation between settlements.
	Undeveloped coastline and countryside	R = Located outside of the Built Up Area Boundary Y = Partly within/outside the Built Up Area Boundary G = Located within the Built Up Area Boundary	There are no stretches defined as heritage coast in Worthing. However there are areas of countryside and small stretches of undeveloped coastline located outside of the Built Up Area Boundary. The Worthing Landscape and Ecology Study 2017 (See above) assessed the suitability for development of potential edge of town sites in terms of their contribution to the setting of surrounding landscape/settlement. The findings of the Landscape Study, where appropriate, are taking into consideration when considering the final scoring of sites in addition to the criteria on the left.
Built environment	Derelict sites	R = Greenfield or currently undeveloped site Y = Previously developed land, currently in use G = Previously developed land, derelict or vacant site	Previously developed land (brownfield) offers the greatest opportunity to make the best use of land available and thus improve the quality of the built environment.
Historic Environment	Designated Heritage Assets	R = The site contains a designated heritage asset. Y = The site is located close to a designated heritage asset G = The site is not adjacent to and does not contain any designated heritage assets	Heritage assets, their setting and the wider historic environment should be conserved and enhanced. Sensitive design will be required to ensure no significant harm is caused to heritage assets and their setting. However, it is also recognised that in some locations, development may present an opportunity to improve their setting. Designated heritage assets are defined as a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Historic Park and Garden, Registered Battlefield or Conservation Area.
	Archaeology	R = within an Archaeological Notification Area Y = Adjacent to an Archaeological Notification Area G = Not within or adjacent to an Archaeological Notification Area	Within or adjacent to an Archaeological Notification Area (ANA). ANAs define only currently known and recorded areas containing sensitive heritage assets.
Healthy Lifestyles	Accessible open space, sport and leisure	R = The site contains accessible open space, indoor or outdoor sport facilities including playing pitches	Open space is important for health and wellbeing. Paragraph 74 of the NPPF states existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless the land is surplus to requirements, the loss would be

		<p>Y = There is no accessible open space within the acceptable walking distance of the site</p> <p>G = there is accessible open space within the accessibility standard for walking</p>	replaced or the development is for alternative sport and recreational provision which would outweigh the loss. The Adur and Worthing Open Space Assessment Report 2014 uses an accessibility standard of 15 minute walk or 1200m for parks and gardens, natural and semi-natural (NSN) greenspace and provision for children and young people, a 10 minute walk for allotments and a 5 minute walk for amenity greenspace.
Crime and public safety	Indices of Multiple Deprivation	<p>R = Sites within 10 most deprived LSOA in West Sussex</p> <p>Y = Sites within 10 most deprived LSOA in Worthing (other than above)</p> <p>G = Outside of the above</p>	Areas within Central and Heene wards are ranked within the 10 most deprived in West Sussex. Areas within Central, Heene, Northbrook and Broadwater score within the 20% most deprived areas nationally. It should be noted that there are significant variations within wards.
Housing	Delivering new homes of the right mix and tenure	<i>It is not possible at this stage to make this kind of assessment on what a site could provide. However this will be assessed fully when policies relating to the sites are assessed.</i>	
Communities	Proximity to doctor's Surgeries	<p>R = The site currently includes a doctor's surgery which as a result of development could potentially be lost.</p> <p>Y = The site is not within 800m of a doctor surgery</p> <p>G = The site is within 800m of a doctor's surgery</p>	Helps to support sustainability and health of communities. 800m is considered acceptable walking distance. Recognises that although walking distance to a doctor's surgery is a benefit, it is not something that would prevent development from being acceptable. Those sites which currently include a doctor's surgery are scored red to reflect the possibility that the facility could be lost as a result of development. Whilst it is acknowledged that replacement facilities could be provided as part of development it not considered appropriate to make this assumption at this stage.
	Proximity to Libraries	<p>R = The site currently includes a library which as a result of development could potentially be lost</p> <p>Y = The site is not within 800m of a library</p> <p>G = The site is within 800m of a library</p>	Helps to support sustainability and health of communities. 800m is considered an acceptable walking distance. Recognises that although walking distance to a library is a benefit, it is not something that would prevent development from being acceptable. Those sites which currently include a library are scored red to reflect the possibility that the facility could be lost as a result of development. Whilst it is acknowledged that replacement facilities could be provided as part of development it not considered appropriate to make this assumption at this stage.
Education	Proximity to primary schools (infant, junior)	R = The site currently includes, or has land associated with, a primary school which as a result of development could potentially be	There is no agreed suitable walking distance to a school. Providing for Journeys on Foot (IHT, 2000) states a desirable distance is 500m, acceptable is 1 km and maximum is 2km. Statutory walking distances are 2 miles (3.2km for children under 8 and 3 miles

		lost	(4.8km) for children over 8 however this is based on a safe route. Therefore to strike a balance 1 km is assessed. Those sites which could potentially result in the loss of a school or land associated with that school such as playing fields are scored red. Whilst it is recognised that replacement facilities could be provided as part of development it is not considered appropriate to make that assumption at this stage.
		Y = The site is not within 1 km from a primary, infant or junior school	
		G = The site is within 1 km of a primary, infant or junior school	
	Proximity to secondary schools	R = The site currently includes, or has land associated with, a secondary school which as a result of development could potentially be lost	Although the importance of further and higher education is also recognised these often cater for pupils on a wider than Borough catchment. As explained above, the statutory walking distance has not been used. A 1.5 km buffer has been used to reflect the higher statutory walking distance for children over 8. No allowance has been made for whether the nearest school is girls or boys only. However this is highlighted in the text.
		Y = The site is not within 1.5km from a secondary school	
		G = The site is within 1.5km of a secondary school	
Economy	Key office location or industrial estate	R = Within a key office location/industrial estate/business park or currently providing employment space	The Worthing Economic Research and Employment Land Review 2016 indicates that the demand for industrial space remains strong whilst an increasingly poor quality office stock in Worthing is in need of renewal. Resisting the loss of employment space will therefore be an important approach in ensuring demand is met.
		Y = Sites previously in employment use	
		G = None of the above	
Town centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	R = N/A	The NPPF defines town centre as including town centres, district centres and local centres. It is important that redevelopment promotes the vitality and viability of existing centres and maintains the balance between them. Those sites within existing centres are best placed to deliver regeneration. Sites within walking distance will also be likely support the vitality and viability of existing centres. An acceptable walking distance is defined as 800m (CIHT Planning for Walking, 2015). A score of 'red' would be used for sites that have the potential to detract and adversely affect the vitality and viability of the town centres. It is not considered appropriate to evaluate whether a site would meet this criteria at this point in time
		Y = Sites more than 800m of a Town Centre	
		G = Sites in or within 800m of a Town Centre	

			therefore no site is scored 'red'.
Travel and Access	Proximity to train station	R = N/A	Planning For Walking (CIHT, 2015) states 800m is generally considered to be an acceptable walking distance and its recognised that people will generally walk 800m to get to a train station compared with only 200-400m for a bus stop. As Worthing is predominantly an urban area it is well served by bus routes therefore a criteria based on this would not distinguish between sites. There is no criterion for a red rating recognising that proximity to a train station would not prevent development.
		Y = Over 800m from the nearest train station	
		G = Within 800m from the nearest train station	
	Proximity to cycle routes	R = N/A	There are two off road cycle routes, the National Route 2 which runs along parts of the seafront and the Findon Cycle Route. There are also a number of non-traffic free cycle routes. There is no criterion for a red rating recognising that this would not prevent development.
		Y = Over 1 km from the nearest cycle route	
		G = Within 1 km of the nearest cycle route	

## APPENDIX D1: SITES APPRAISAL

SA Objective	Indicator	Stagecoach	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	Site does not meet the criteria.	G
Land and Soils	Potentially Contaminated Land	PCL	Y
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	A large portion of the site is located in Flood Zone 2/3. The sequential approach should be applied to site layout so the most vulnerable uses are located in areas of lowest flood risk. The risks must be managed so that any development is safe across its lifetime without increasing flood risk elsewhere.	R
	Surface Water	There is a low chance of flooding from surface water along the southern boundary of the site.	G
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Brownfield site currently in use.	Y
Historic Environment	Designated Heritage Assets	The Steyne Gardens and South Street Conservation Areas cover the entrance to the site along its southern boundary. There are a significant number of listed buildings surrounding the site with The Dome Cinema, a Grade II* Listed Building along the south eastern boundary and Stanford Cottage, a Grade II Listed Building sits along the northern boundary of the site, the listed Chatsworth Hotel and a terrace of residential units (listed) fronting The Steyne. Sensitive design will be required to ensure no significant harm is caused to heritage assets and their setting. However, it is also recognised that there may be opportunities to improve their setting.	R
	Archaeology	Within an Archaeological Notification Area for the historic core of Worthing.	R

Healthy Lifestyles	Accessible open space, sport and leisure	The site is located immediately north of semi-natural greenspace in the form of the seafront (George V Avenue). It has Steyne Gardens immediately to the east of the site and Warwick Street to the north forms a pedestrianised area of civic space. However, there are no allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 7th most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	Is within 800m of 3 doctor surgeries: Health Central Surgery, Selden Medical Centre and Shelley Surgery.	G
	Proximity to Libraries	The nearest library (Worthing Library) is approximately 490m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 900m of St Marys Roman Catholic Primary School and Heene Primary School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison Church of England Comprehensive School for Girls are all within 2km. Davison is the nearest school approximately 1.3km away.	G
Economy	Key office location or industrial estate	The site is currently used as a bus depot with ancillary uses.	R
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within the Town Centre Boundary.	G
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The South Coast Route runs along the seafront to the south of the site.	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>• It is a brownfield site providing an opportunity for regeneration.</li> <li>• It is located in the Town Centre.</li> <li>• Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>• A significant portion of the site is located in Flood Zone 3.</li> <li>• Potentially contaminated land.</li> <li>• The Dome Cinema, a Grade II* Listed Building is located along the southern boundary of the site, and there are a number of other heritage assets surrounding the site.</li> <li>• Within an area containing recorded archaeological remains.</li> <li>• Development of the site could potentially result in the loss of employment space.</li> </ul>			Y

SA Objective	Indicator	Grafton	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	Site does not meet the criteria.	G

Land and Soils	Potentially Contaminated Land	Non PCL.	G
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	The majority of the site, apart from a western section, is located in Flood Zone 3. The risks must be managed so that any development is safe across its lifetime without increasing flood risk elsewhere.	R
	Surface Water	There is a low or very low chance of flooding from surface water.	G
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Brownfield site currently in use.	Y
Historic Environment	Designated Heritage Assets	The Montague Street Conservation Area is located to the north of the site, the South Street Conservation Area is located to the east and south of the site, the Marine Parade and Hinterland Conservation Area is located further away to the west of the site. The Lido, a Grade II Listed Building is located across from the site on the seafront. There are a number of Listed Buildings adjacent to Knightsbridge House fronting Montague Place. Sensitive design will be required to ensure no significant harm is caused to heritage assets and their setting. However it is also recognised that development may present opportunities to improve the setting particularly of The Lido.	Y
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site contains a small patch of amenity greenspace in the south west corner of the site known as Augusta Place. The Open Space Study 2014 recognises it as 'essentially a grassed area with no noticeable features' and subsequently gives it a low value score. Development should seek to re-provide some public open space. The site is also immediately north of semi-natural greenspace in the form of the seafront (George V Avenue). There is a pedestrianised area of civic street down Montague Street to the north of the site. There are no allotments within the 10 minute walk standard.	R
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 8th most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	Is within 800m of 3 doctor surgeries: Health Central Surgery, Rowlands Road Surgery and Shelley Surgery.	G
	Proximity to Libraries	The nearest library (Worthing Library) is approximately 510m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 800m of St Marys Roman Catholic Primary School and Heene Primary School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison Church of England Comprehensive School for Girls are all within 2km. Worthing High School is the nearest school approximately 1.7km away.	Y

Economy	Key office location or industrial estate	The site is currently used as a car park.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within the Town Centre Boundary and within 800m of Rowlands Road local centre.	G
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The South Coast Route runs along the seafront to the south of the site.	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>• It is a brownfield site providing an opportunity for regeneration.</li> <li>• It is located in the Town Centre.</li> <li>• Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>• The majority of the site is in Flood Zone 3.</li> <li>• Development could potentially result in the loss of a small area of amenity greenspace.</li> </ul>			Y

SA Objective	Indicator	Teville Gate	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site experiences some noise from the A24 to the east of the site, Teville Road to the south and the railway line to the north.	Y
Biodiversity	Sites, Habitats and Species	It is recognised that brownfield sites can contain habitats that are of high ecological value. However the site does not contain any open ground or vegetation.	G
Land and Soils	Potentially Contaminated Land	There are some areas of PCL within the site.	Y
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	Flood Zone 1.	G
	Surface Water	The site is within an area having a high chance of flooding from surface water.	R
	Groundwater	The site is in an area considered to be at a high risk of groundwater flooding.	R
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G



	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Derelict site.	G
Historic Environment	Designated Heritage Assets	The Grade II Worthing Railway Station Listed Building is located to the north of the site with Grand Victorian Hotel on Railway Approach to the west. Mitigation should be incorporated to protect and enhance the asset and its setting. Sensitive design will be required to ensure no significant harm is caused to heritage assets and their setting. However it is also recognised that in some locations development may present an opportunity to improve their setting.	Y
	Archaeology	The site is not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within the 15min walk accessibility standard of semi-natural greenspace along the seafront and a number of parks and gardens. The closest available is Homefield Park. There is also a large amenity greenspace at Victoria Park. However there are no allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as being the most deprived area in Worthing and within the 10 most deprived areas in West Sussex according to the IMD 2015.	R
Communities	Proximity to doctor's Surgeries	Is within 800m of 4 doctor surgeries: Broadwater Road Practice, Health Central Surgery, Shelley Surgery, and Victoria Road Practice.	G
	Proximity to Libraries	The nearest library (Worthing Library) is approximately 400m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 450m from Heene Primary School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison Church of England Comprehensive School for Girls are all within 2km. St Andrews and Worthing High School are nearest both approximately 700m away.	G
Economy	Key office location or industrial estate	Teville Gate House is within the Railway Approach key office location. The Employment Land Review Study assesses this building as in poor condition and left vacant for several years, and would be difficult to reoccupy unless the site and structures were completely redeveloped.	R
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is located within 800m of the Town Centre Boundary and South Farm Road local centre.	G
Travel and Access	Proximity to train station	Within 400m of Worthing train station.	G
	Proximity to cycle routes	The Findon Cycle Route (non traffic free) runs from 200m north west of the site.	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>• The site is in a sustainable location within walking distance of Worthing train station.</li> <li>• It is a vacant brownfield site providing an opportunity for regeneration.</li> <li>• The site is in Flood Zone 1.</li> <li>• Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>• Potentially contaminated land.</li> <li>• The site has a high chance of surface water and groundwater flooding.</li> <li>• Development could potentially result in the loss of employment space.</li> <li>• The site is in the most deprived area of Worthing.</li> </ul>			Y

SA Objective	Indicator	Union Place	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site experiences some noise from the A259 to the east of the site.	Y
Biodiversity	Sites, Habitats and Species	It is recognised that brownfield sites can contain habitats that are of high ecological value. However there is currently no evidence to suggest that this site has local importance for biodiversity.	G
Land and Soils	Potentially Contaminated Land	PCL	Y
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	Flood Zone 1.	G
	Surface Water	There are small patches of medium and high chance of flooding from surface water. However the majority of the site has a low or very low chance of flooding from surface water.	Y
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Derelict site.	G
Historic Environment	Designated Heritage Assets	The site is located to the east of the Chapel Road Conservation Area and would be visible from the northern end of Steyne Gardens Conservation Area. There are a number of Grade II Listed Buildings on roads adjacent to the site.	Y
	Archaeology	Not within but west of the High Street from an Archaeological Notification Area for Medieval Settlement Activity.	Y
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within the 15min walk accessibility standard of semi-natural greenspace along the seafront and a number of parks and gardens. The closest available are Liverpool Gardens and Steyne Gardens. However there are no allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 7th most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	Is within 800m of 4 doctor surgeries: Health Central Surgery, Selden Medical Centre, Shelley Surgery and Victoria Road	G

		Practice.	
	Proximity to Libraries	The nearest library (Worthing Library) is approximately 200m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 800m of St Marys Roman Catholic Primary School, Heene Primary School and Chesswood Junior School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison Church of England Comprehensive School for Girls are all within 2km. St Andrews school is nearest approximately 1 km away.	G
Economy	Key office location or industrial estate	This is the site of the former police station which was demolished in 2009.	Y
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within the Town Centre Boundary and within 800m of South Farm Road local centre.	G
Travel and Access	Proximity to train station	Within 800m of Worthing train station.	G
	Proximity to cycle routes	The town centre route (non traffic free is approximately 200m to the south east of the site. The South Coast Route runs along the seafront approximately 400m south of the site.	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>• The site is in a sustainable location within walking distance of Worthing train station.</li> <li>• It is a vacant brownfield site providing an opportunity for regeneration.</li> <li>• It is located in the Town Centre.</li> <li>• The site is in Flood Zone 1.</li> <li>• Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>• Potentially contaminated land</li> </ul>			G

SA Objective	Indicator	British Gas Site, Lyndhurst Road	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	Site does not meet the criteria.	G
Land and Soils	Potentially Contaminated Land	Significant levels of contamination likely to be present on site due to previous use as a British Gas holder and depot.	R
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	Flood Zone 1.	G
	Surface Water	There is a very low chance of flooding from surface water.	G
	Groundwater	The site is in an area considered to be at a medium risk of groundwater flooding.	Y
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific	G

		nature of development and will need to be considered and assessed at the planning application stage.	
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Derelict site.	G
Historic Environment	Designated Heritage Assets	The site does not contain and is not adjacent to any designated heritage assets. The site is located adjacent to the Park Road Environmental Areas of Special Character.	G
	Archaeology	Within an Archaeological Notification Area for Medieval Settlement Activity.	R
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within the 15min walk accessibility standard of semi-natural greenspace along the seafront and a number of parks and gardens. Beach House Park is immediately to the east of the site and Homefield Park located nearby to the north of the site. However there are no allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 7th most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	Is within 800m of 2 doctor surgeries: Health Central Surgery and Selden Medical Centre.	G
	Proximity to Libraries	The nearest library (Worthing Library) is approximately 480m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 600m from Chesswood Junior School and 800m from Lyndhurst First School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison Church of England Comprehensive School for Girls are all within 2km. St Andrews is nearest approximately 800m away.	G
Economy	Key office location or industrial estate	The site is occupied by a largely redundant gasholder and depot buildings.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within the Town Centre Boundary.	G
Travel and Access	Proximity to train station	Within 800m of Worthing train station.	G
	Proximity to cycle routes	Homefield Park cycle route is approximately 250m north of the site.	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>• The site is in a sustainable location within walking distance of Worthing train station.</li> <li>• It is a vacant brownfield site providing an opportunity for regeneration.</li> <li>• It is located in the Town Centre.</li> <li>• The site is in Flood Zone 1.</li> <li>• Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>• Significant levels of contaminated land.</li> <li>• Within an area containing recorded archaeological remains.</li> </ul>			G

SA Objective	Indicator	Martlets Way	Score
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Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site experiences some noise associated with the railway line to the north.	Y
Biodiversity	Sites, Habitats and Species	It is recognised that brownfield sites can contain habitats that are of high ecological value. However there is currently no evidence to suggest that this site has local importance for biodiversity.	G
Land and Soils	Potentially Contaminated Land	Significant levels of contamination likely to be present on site due to previous use as a sewage treatment works and British Gas holder.	R
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	Flood Zone 1.	G
	Surface Water	There is a low or very low chance of flooding from surface water.	G
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Vacant brownfield site.	G
Historic Environment	Designated Heritage Assets	The site does not contain and is not adjacent to any designated heritage assets. The nearest Conservation Area is the Shaftesbury Avenue Conservation Area located approximately 500m south east of the site.	G
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within the 15min walk accessibility standard of semi-natural greenspace at Ilex Way and along the seafront. Field Place and Molson Community Garden are also located within the 15 minute buffer and there is amenity greenspace to the east of the site.	G
Crime and Public Safety	Indices of Multiple Deprivation	IMD rank in Worthing 2015 was 21 out of 65.	G
Communities	Proximity to doctor's Surgeries	Is within 800m of The Strand Surgery.	G
	Proximity to Libraries	The nearest library (Goring Library) is approximately 600m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 280m from West Park Church of England Primary school and 500m from Goring Church of England Primary School.	G
	Proximity to secondary schools	Chatsmore Catholic High School and Durrington High School are both within 2km. Chatsmore is approximately 1.2km.	G
Economy	Key office location or industrial estate	Part of the site to the west was previously used as a sewage treatment works, the eastern part of the site was formerly used as a British Gas holder and land to the south of this is an area of open land.	G
Town Centres	Within 800m of a town centre defined	Within 800m of The Strand and The Mulberry local centres.	G

	by the NPPF as including town centres, district centres and local centres		
Travel and Access	Proximity to train station	Within 400m of Durrington train station.	G
	Proximity to cycle routes	The Town Centre to Goring (non traffic free) route is approximately 400m south of the site.	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>• The site is in a sustainable location within walking distance of Durrington train station.</li> <li>• It is a vacant brownfield site providing an opportunity for regeneration.</li> <li>• The site is in Flood Zone 1.</li> <li>• Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>• Significant levels of contaminated land.</li> </ul>			G

SA Objective	Indicator	Decoy Farm	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is accessed from the A27 within the AQMA. Therefore without mitigation development is likely to increase traffic and congestion within the AQMA.	R
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located within a Source Protection Zone. However the Teville Stream flows along the site boundary. There may be opportunities through development to provide enhancements to the stream to help it meet good ecological potential as required by WFD.	Y
	Noise	The south eastern corner of the site experiences some noise associated with the railway line to the south.	Y
Biodiversity	Sites, Habitats and Species	The Teville Stream flows through the site and records show woodland in the north of the site. This should be retained and enhanced. Sussex Biodiversity Centre has records of slow worm and common lizard on the site both legally protected species under the Wildlife and Countryside Act (WCA).	Y
Land and Soils	Potentially Contaminated Land	Significant levels of contamination likely to be present on site due to previous use as a landfill.	R
	Agricultural Land	Former landfill.	G
Water Management	Flooding from Rivers and Sea	Partly Flood Zone 2/3. Development should be located in areas of Flood Zone 1 only.	Y
	Surface Water	There is a low or very low chance of flooding from surface water. There are areas with a high chance of flooding of surface water along the site boundaries.	R
	Groundwater	The site is partly in an area considered to be at a high risk of groundwater flooding.	R
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms a small section of the break in the built up area between Worthing and Lancing/Sompting. Mitigation should be incorporated to minimise the impact of development on the landscape.	Y
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary adjacent to countryside. Mitigation should be incorporated to minimise the impact of development on the landscape.	G

Built Environment	Derelict sites	Undeveloped former landfill site.	R
Historic Environment	Designated Heritage Assets	The site does not contain and is not adjacent to any designated heritage assets.	G
	Archaeology	Adjacent to an Archaeological Notification Area to the east for roman settlement and fundery activity and Sompting World War II Prisoner of War Camp, Sompting.	Y
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within the 15min walk accessibility standard of semi-natural greenspace and parks and gardens. Immediately south of the site over the railway line there is an area of allotments and there are a number of areas of amenity greenspace located close by.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 4th most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (Selden Medical Centre) is approximately 1200m away.	Y
	Proximity to Libraries	The nearest library (Broadwater Library) is approximately 800m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 700m from Downsbrook Primary School, 750m from Springfield Infant School and 780m from Chesswood Junior school.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison Church of England Comprehensive School for Girls are all within 2km. Davison is nearest approximately 600m away.	G
Economy	Key office location or industrial estate	The area is largely undeveloped and was formerly used as a landfill site. A household waste recycling facility is present off the southwest boundary.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is not within 800m of the town centre or a district or local centre.	Y
Travel and Access	Proximity to train station	Within 400m of East Worthing train station.	G
	Proximity to cycle routes	The Homefield Park cycle route is approximately 1 km south west of the site.	Y
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>The site is in a sustainable location within walking distance of East Worthing train station.</li> <li>It is a vacant brownfield site providing an opportunity for regeneration.</li> <li>Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>In close proximity to the AQMA.</li> <li>The Teville Stream flows along the edge of the site.</li> <li>Significant levels of contaminated land.</li> <li>Parts of the site are at a high chance of flooding from rivers, surface water and groundwater</li> </ul>			Y

SA Objective	Indicator	Centenary House	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G

	Noise	The site experiences road noise from the A2032 to the south.	Y
Biodiversity	Sites, Habitats and Species	Site does not meet the criteria.	G
Land and Soils	Potentially Contaminated Land	Non PCL.	G
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	Flood Zone 1.	G
	Surface Water	The southern part of the site is in an area with a medium chance of flooding from surface water. The road to the south of the site is within an area with a high chance of flooding from surface water. There are records of historic surface water flooding in the vicinity of the site.	Y
	Groundwater	The site is in an area considered to be at a high risk of groundwater flooding.	R
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Brownfield site currently in use.	Y
Historic Environment	Designated Heritage Assets	The site does not contain and is not adjacent to any designated heritage assets.	G
	Archaeology	The site is within an Archaeological Notification Area for the prehistoric and medieval occupation at Gateway House (Centenary House) Durrington, Worthing.	R
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within a 15min walk of semi-natural greenspace and parks and gardens. There is a small area of amenity greenspace to the north of the site with a large area of amenity greenspace nearby to the east which backs onto Whitebeam Woods a Site of Nature Conservation Importance. However there are no allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	IMD rank in Worthing 2015 was 25 out of 65.	G
Communities	Proximity to doctor's Surgeries	The site is within 800m of 3 doctor surgeries: The Mayflower Surgery, The Strand Surgery and Victoria Road Practice.	G
	Proximity to Libraries	The nearest library (Durrington Library) is approximately 1000m away.	Y
Education	Proximity to primary schools (infant, junior)	Approximately 500m from Hawthorns Primary School and 300m from English Martyrs Roman Catholic Primary School.	G
	Proximity to secondary schools	Durrington High School is approximately 500m away.	G
Economy	Key office location or industrial estate	Currently offices used by WSCC and Sussex Police. The Employment Land Review study concludes that the site supports a prominent office building within a well designed and maintained site, although finding new tenants for the buildings if they ever became vacant could be difficult given their scale and location.	R
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is not within 800m of the town centre or a district or local centre.	Y



Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The Littlehampton Road (non traffic free) cycle route is immediately south of the site.	G
<b>Conclusions</b> Opportunities: <ul style="list-style-type: none"> <li>• It is a brownfield site providing an opportunity for regeneration.</li> <li>• The site is in Flood Zone 1.</li> <li>• Located within the Built Up Area Boundary.</li> </ul> Constraints: <ul style="list-style-type: none"> <li>• High risk of groundwater flooding.</li> <li>• Development could potentially result in the loss of employment space.</li> <li>• Within an area containing recorded archaeological remains.</li> </ul>			Y

SA Objective	Indicator	HMRC offices, Barrington Road	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site experiences some noise associated with the railway line to the north.	Y
Biodiversity	Sites, Habitats and Species	Site does not meet the criteria.	G
Land and Soils	Potentially Contaminated Land	PCL	Y
	Agricultural Land	Previously developed urban land.	G
Water Management	Flooding from Rivers and Sea	Flood Zone 1.	G
	Surface Water	Parts of the site are in areas with a high chance of flooding from surface water. There are records of historic surface water flooding in the vicinity of the site.	R
	Groundwater	The site is partly in an area considered to be at a medium risk of groundwater flooding.	Y
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Brownfield site currently in use.	Y
Historic Environment	Designated Heritage Assets	The site does not contain and is not adjacent to any designated heritage assets. The nearest Conservation Area is the Shaftesbury Avenue Conservation Area located approximately 500m south east of the site.	G
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within the 15min walk accessibility standard of semi-natural greenspace at Ilex Way and along the seafront. Field Place and Molson Community Garden are also located within the 15 minute buffer and	G

		there is amenity greenspace to the east of the site.	
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 4th least deprived area in Worthing according to the IMD 2015 (62/65).	G
Communities	Proximity to doctor's Surgeries	The site is within 800m of 2 doctor surgeries: Cornerways Practice and The Strand Surgery.	G
	Proximity to Libraries	The nearest library (Goring Library) is approximately 800m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 350m from West Park Church of England Primary school and 700m from Goring Church of England Primary School, 800m from Elm Grove Primary School and 800m from Field Place Infant School and Orchards Junior School.	G
	Proximity to secondary schools	Chatsmore Catholic High School and Durrington High School are both within 2km. Chatsmore is approximately 1.3km.	G
Economy	Key office location or industrial estate	The site includes vacant land and offices currently in use by HM Revenues and Customs (HMRC). The Employment Land Review Study highlights the importance of ensuring the opportunity to enhance the provision of employment land in this area is maximised. The Inland Revenue site is currently a low density site that includes a number of older office buildings that are in reasonable condition, but would be largely unsuitable for other occupiers if they ever became vacant.	R
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within 800m of Goring Road district centre and The Mulberry and The Strand local centres.	G
Travel and Access	Proximity to train station	Within 400m of Durrington train station.	G
	Proximity to cycle routes	The Town Centre to Goring (non traffic free) route is approximately 400m south of the site.	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>The site is in a sustainable location within walking distance of Durrington train station.</li> <li>It is a brownfield site providing an opportunity for regeneration.</li> <li>The site is in Flood Zone 1.</li> <li>Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>Potentially contaminated land.</li> <li>High chance of surface water flooding and records of historic flooding.</li> <li>Development could potentially result in the loss of employment space</li> </ul>			Y

SA Objective	Indicator	Civic Centre Car Park	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site experiences some noise associated with the road to the south.	Y
Biodiversity	Sites, Habitats and Species	Site does not meet the criteria.	G
Land and Soils	Potentially Contaminated Land	Non PCL.	G
	Agricultural Land	Previously developed urban land.	G
Water	Flooding from Rivers and Sea	Flood Zone 1.	G

Management	Surface Water	There is a low or very low chance of flooding from surface water.	G
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and Character	Setting of South Downs National Park	Due to the distance from the National Park and urban setting the site is unlikely to impact on its setting. However this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
	Coalescence	The site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary.	G
Built Environment	Derelict sites	Brownfield site currently in use.	Y
Historic Environment	Designated Heritage Assets	The site is located adjacent to the Chapel Road Conservation Area. The Town Hall, a Grade II Listed Building is immediately to the east of the site.	Y
	Archaeology	Within an Archaeological Notification Area for Roman Settlement Activity.	R
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within a 15min walk of semi-natural greenspace and parks and gardens. Amelia Park and Liverpool Gardens are both located nearby. However there are no allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 8th most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	The site is within 800m of 5 doctor's surgeries. However the site contains a Health Central Surgery which could result in the potential loss of a surgery if not reprovided as part of development.	R
	Proximity to Libraries	The nearest library (Worthing Library) is approximately 80m away.	G
Education	Proximity to primary schools (infant, junior)	Approximately 450m from St Marys Roman Catholic Primary School and Heene Primary School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt and Davison Church of England Comprehensive School for Girls are all within 2km. St Andrews is the nearest school approximately 950m away.	G
Economy	Key office location or industrial estate	The site is currently in use as a car park for the Town Hall and council buildings.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within the Town Centre Boundary and within 800m of Rowlands Road and South Farm Road local centres.	G
Travel and Access	Proximity to train station	Within 800m of Worthing train station.	G
	Proximity to cycle routes	The Town Centre - Goring Route (non traffic free) is approximately 300m south of the site, the Findon Cycle Route (non traffic free) is approximately 500m north of the site and the South Coast Route (traffic free) is approximately 600m south of the site.	G
<b>Conclusions</b> Opportunities: <ul style="list-style-type: none"> <li>• The site is in a sustainable location within walking distance of Worthing train station.</li> <li>• It is a brownfield site providing an opportunity for regeneration.</li> <li>• It is located in the Town Centre.</li> <li>• The site is in Flood Zone 1.</li> <li>• Located within the Built Up Area Boundary.</li> </ul>			Y

<p>Constraints:</p> <ul style="list-style-type: none"> <li>• Development could potentially result in the loss of a doctor's surgery.</li> <li>• Within an area containing recorded archaeological remains.</li> </ul>	
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SA Objective	Indicator	Land North of Beeches Avenue	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is accessed from the A27 within the AQMA. Therefore without mitigation development is likely to increase traffic and congestion within the AQMA.	R
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Within a Source Protection Zone 1. Mitigation should be provided to protect groundwater from pollution and promote the use of appropriate SuDS.	R
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	The Worthing Landscape & Ecology Study 2017 describes the site as dominated by intensively grazed grassland paddocks of negligible/less than local conservation interest in their own right. Dense linear scrub along the western site margin is species-poor but contributes to a corridor of linear semi-natural habitat along Charmandean Lane which in combination is considered of local value. Approximately 120m north of the site in the SDNP is Charmandean Quarry a Regionally Important Geological and Geomorphological Sites (RIGS).	Y
Land and Soils	Potentially Contaminated Land	Non PCL	G
	Agricultural Land	Grade 2	R
Water Management	Flooding from Rivers and Sea	Flood Zone 1	G
	Surface Water	There is a low or very low chance of flooding from surface water.	G
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and Character	Setting of South Downs National Park	The Worthing Landscape and Ecology Study 2017 states the site adjoins and is visible from part of the SDNP to the north but makes a limited contribution to its setting.	Y
	Coalescence	The Worthing Landscape and Ecology Study 2017 states the site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located outside of the current Built Up Area Boundary. The Worthing Landscape and Ecology Study 2017 states that although the site provides an open aspect and undeveloped skyline when viewed from the existing Built Up Area to the south, although makes only a minimal contribution to the rurality of the adjacent downland landscape.	R
Built Environment	Derelict sites	Greenfield site	R
Historic Environment	Designated Heritage Assets	The site does not contain and is not adjacent to any designated heritage assets.	G
	Archaeology	The site is adjacent to an Archaeological Notification Area to the north for multi-period archaeological features, Cissbury Ring, Cissbury Hill, Canada Bottom and Vineyard Hill, Worthing.	Y
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within a 15min walk of semi-natural greenspace with Hill Barn Lane which is part of the Worthing and Hill Barn Golf Courses SNCI. However there are no parks and Gardens within the 15 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 8th least deprived area in Worthing according to the IMD 2015 (58/65).	G

Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (Broadwater Medical Centre) is approximately 900m away.	Y
	Proximity to Libraries	The nearest library (Broadwater Library) is approximately 1100m away.	Y
Education	Proximity to primary schools (infant, junior)	Approximately 850m from Bramber Primary School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys and Bohunt are all within 2km. Bohunt is the nearest school approximately 1.2km away.	G
Economy	Key office location or industrial estate	Part of the site is currently in use as a car body repair (Auto Panels) business. The redevelopment of this site could potentially result in a loss of a small amount of employment space.	Y
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is not within 800m of the town centre or a district or local centre	Y
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The site is not within 1 km of a cycle route.	Y
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>The site is in Flood Zone 1.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>In close proximity to the AQMA.</li> <li>Within a Source Protection Zone 1.</li> <li>Adjoins SDNP to the north.</li> </ul>			Y

SA Objective	Indicator	Worthing United Football Club	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is accessed from the A27 within the AQMA. Therefore without mitigation development is likely to increase traffic and congestion within the AQMA.	R
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Within a Source Protection Zone 1. Mitigation should be provided to protect groundwater from pollution and promote the use of appropriate SuDS.	R
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	The Worthing Landscape & Ecology Study 2017 describes the site as dominated by an intensively managed grassland sports pitch of negligible/less than local conservation interest. Mature Poplar tree on the southern boundary of the site contributes to the interest and integrity of a linear corridor of trees and scrub which is considered as a whole to be of local value.	Y
Land and Soils	Potentially Contaminated Land	Non PCL although the site is adjacent to PCL.	G
	Agricultural Land	Grade 2	R
Water Management	Flooding from Rivers and Sea	Flood Zone 1	G
	Surface Water	The north eastern corner of the site is in an area with a high chance of flooding from surface water.	R
	Groundwater	The site is in an area considered to be at a low risk of groundwater flooding.	G
Landscape and	Setting of South Downs	The Worthing Landscape and Ecology Study 2017 states that the site	Y

Character	National Park	adjoins and is visible from part of the SDNP to the north, but makes a limited contribution to its setting.	
	Coalescence	The Worthing Landscape and Ecology Study 2017 states the site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary adjacent to countryside. The Worthing Landscape and Ecology Study 2017 states that the site does not contribute to the rurality of the surrounding landscape due to its current land use and earthworks.	G
Built Environment	Derelict sites	Greenfield site, Worthing United Football Club is currently located on the site.	R
Historic Environment	Designated Heritage Assets	The site does not contain and is not adjacent to any designated heritage assets.	G
	Archaeology	The site is adjacent to an Archaeological Notification Area to the north for multi-period archaeological features, Cissbury Ring, Cissbury Hill, Canada Bottom and Vineyard Hill, Worthing.	Y
Healthy Lifestyles	Accessible open space, sport and leisure	The site contains playing pitch for Worthing United Football Club. It is within a 15min walk of semi-natural greenspace with Hill Barn Lane which is part of the Worthing and Hill Barn Golf Courses SNC. However there are no parks and Gardens within the 15 minute walk standard.	R
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 8th least deprived area in Worthing according to the IMD 2015 (58/65).	G
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (Broadwater Medical Centre) is approximately 1000m away.	Y
	Proximity to Libraries	The nearest library (Broadwater Library) is approximately 1100m away.	Y
Education	Proximity to primary schools (infant, junior)	Approximately 750m from Bramber Primary School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys and Bohunt are all within 2km. Bohunt is the nearest school approximately 1.3km away.	G
Economy	Key office location or industrial estate	The site is occupied by Worthing United Football Club - would not result in any potential loss of employment space.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is not within 800m of the town centre or a district or local centre.	Y
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The site is not within 1 km of a cycle route.	Y
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>The site is in Flood Zone 1.</li> <li>Located within the Built Up Area Boundary.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>Development would result in the loss of a playing pitch associated with Worthing United Football Club.</li> <li>In close proximity to the AQMA.</li> <li>Within a Source Protection Zone 1.</li> <li>Part of the site has a high chance of surface water flooding.</li> <li>Adjoins SDNP to the north.</li> </ul>			R

SA Objective	Indicator	Land South of Upper Brighton Road	Score
Environmental Quality	Worthing Air Quality Management Area	This site is located in close proximity to the A27 within the AQMA. Any traffic accessing this is likely to need to travel through the	R

	(AQMA)	Management Area. Therefore without mitigation development is likely to increase traffic and congestion within the AQMA.	
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Within a Source Protection Zone 1. Mitigation should be provided to protect groundwater from pollution and promote the use of appropriate SuDS.	R
	Noise	The northern portion of the site experiences road noise from the A27 which is adjacent to the site.	Y
Biodiversity	Sites, Habitats and Species	The Worthing Landscape & Ecology Study 2017 describes the site as dominated by arable land and species-poor grassland fields. Mature native hedgerows and scrub with associated trees and ditches along field boundaries in addition to a potential waterbody located in the east of the site form part of a network of linear semi-natural habitats. In combination these features are considered of moderate local value for wildlife. Sussex Biodiversity Centre has records of slow worm on the site, a legally protected species under the Wildlife and Countryside Act (WCA).	Y
Land and Soils	Potentially Contaminated Land	Non PCL	G
	Agricultural Land	Grade 2	R
Water Management	Flooding from Rivers and Sea	Flood Zone 1	G
	Surface Water	Parts of the site are in areas with a medium chance of flooding from surface water.	Y
	Groundwater	The site is partly in an area considered to be at a high risk of groundwater flooding.	R
Landscape and Character	Setting of South Downs National Park	The site is separated from the SDNP to the north by the A27. The Landscape and Ecology Study 2017 states that the site is visible from the SDNP to the north and that whilst the majority of the site forms part of an undeveloped southern setting to the SDNP it recognises that the northern field of the site forms a small part of the local southern setting to the National Park.	Y
	Coalescence	The Landscape and Ecology Study 2017 states that the site forms part of the separation between the western edge of Worthing and the ribbon of development along Upper Brighton Road. The site is also part of the wider physical and visual separation between Worthing and Sompting but is detached from the Worthing - Sompting gap.	Y
	Undeveloped coastline and countryside	Located outside of the Built Up Area Boundary. The Worthing Landscape and Ecology Study states that the site is a continuation of low lying farmland which forms the eastern setting to Worthing and an undeveloped setting to the SDNP.	R
Built Environment	Derelict sites	Greenfield site.	R
Historic Environment	Designated Heritage Assets	The Sompting Conservation Area is located immediately to the east of the site, along with Upton Farm House a Grade II Listed Building.	Y
	Archaeology	The site is adjacent to an Archaeological Notification Area for roman settlement and funerary activity and Sompting World War II Prisoner of War Camp, Sompting.	Y
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within a 15min walk of semi-natural greenspace with Malthouse Meadow to the east in Adur District. However there are no parks and Gardens within the 15 minute walk standard or allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	IMD rank in Worthing 2015 was 42 out of 65.	G
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (Broadwater Medical Centre) is approximately 1000m away.	Y

	Proximity to Libraries	The nearest library (Broadwater Library) is approximately 800m away.	G
Education	Proximity to primary schools (infant, junior)	The site is adjacent to Bramber Primary School and approximately 700m from Downsbrook Primary School.	G
	Proximity to secondary schools	Worthing High School, St Andrews Church of England High School for Boys, Bohunt, Davison Church of England Comprehensive School for Girls and Sir Robert Woodard Academy are all within 2km. Bohunt is the nearest school approximately 1.4km away.	G
Economy	Key office location or industrial estate	The site is undeveloped - would not result in any potential loss of employment space.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is not within 800m of the town centre or a district or local centre.	Y
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The site is not within 1 km of a cycle route.	Y
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>The site is in Flood Zone 1.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>In close proximity to the AQMA.</li> <li>Within a Source Protection Zone 1.</li> <li>High risk of groundwater flooding.</li> <li>The northern part of the site is visible from the SDNP and considered to form part of its undeveloped setting.</li> </ul>			Y

SA Objective	Indicator	Goring Ferring Gap	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	The Worthing Landscape & Ecology Study 2017 describes the site as dominated by arable land with smaller species-poor grassland fields in the east and south. The habitat of greatest ecological interest associated with the site is the mixed woodland bordering the eastern site boundary which forms a substantial corridor of habitat and is therefore considered of high local value. A small area of woodland located in the centre of the site and lines of trees and scrub along the north-eastern and northern site boundaries also enhance the interest of the site and wider area, and/or form wildlife corridors. In addition, a pond is located on the western site boundary. These features are considered to be of moderate local wildlife value. Sussex Biodiversity Centre has records of common lizard on the site, a legally protected species under the Wildlife and Countryside Act (WCA).	Y
Land and Soils	Potentially Contaminated Land	Non PCL	G
	Agricultural Land	Grade 2	R
Water Management	Flooding from Rivers and Sea	Partly Flood Zone 2/3. Development should be located in areas of Flood Zone 1 only.	Y



	Surface Water	Parts of the site are in areas with a high chance of flooding from surface water.	R
	Groundwater	The site is in an area considered to be at a medium risk of groundwater flooding.	Y
Landscape and Character	Setting of South Downs National Park	The Landscape and Ecology Study 2017 states that the site provides a visual link free from development between the undeveloped coastline and Highdown Hill within the SDNP. The majority of the site is visible on the horizon from the SDNP and forms part of the visual setting to the NP, although the north eastern corner is not obvious in the view.	R
	Coalescence	The Landscape and Ecology Study 2017 states that the site provides effective physical and visual separation between Goring and Ferring and forms the open character of the gap between settlements.	R
	Undeveloped coastline and countryside	Located outside of the Built Up Area Boundary along a stretch of undeveloped coastline. The Worthing Landscape and Ecology Study 2017 states that the site makes a substantial contribution to the rurality and undeveloped character of the coastline and is part of a visually unbroken countryside and undeveloped coastal setting to wider settlements.	R
Built Environment	Derelict sites	Greenfield site.	R
Historic Environment	Designated Heritage Assets	The Goring Hall Conservation Area is located to the north of the site. Goring Hall and the Former Stables at Goring Hall are Grade II Listed Buildings to the north west of the site.	Y
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	There are areas of semi/natural greenspace running along the sites northern boundary at Ilex Way, in the centre of the site 'Amberley Drive' and along the eastern boundary (The Plantation North). South of the site the plantation continues and there is further amenity greenspace and semi/natural greenspace along the seafront. The site is adjacent to Fernhurst Recreation Ground and Goring Hall Recreation Ground. However there are no allotments within the 10 minute walk standard.	R
Crime and Public Safety	Indices of Multiple Deprivation	IMD rank in Worthing 2015 was 52 out of 65.	G
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (The Phoenix Surgery) is approximately 815m away.	Y
	Proximity to Libraries	The nearest library (Goring Library) is approximately 900m away.	Y
Education	Proximity to primary schools (infant, junior)	The nearest school Goring Church of England Primary School is approximately 1 km away.	Y
	Proximity to secondary schools	Chatsmore Catholic High School is approximately 850m away.	G
Economy	Key office location or industrial estate	The site is undeveloped - would not result in any potential loss of employment space.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is not within 800m of the town centre or a district or local centre.	Y
Travel and Access	Proximity to train station	The northern part of the site is within 800m of Goring train station.	G
	Proximity to cycle routes	The site is approximately 600m of the town centre - Goring route (non traffic free).	G
<b>Conclusions</b> Opportunities: • Northern part of the site is in a sustainable location within walking distance of Goring train station.			R

<p>Constraints:</p> <ul style="list-style-type: none"> <li>• Parts of the site are in Flood Zone 3 and have a high chance of surface water flooding.</li> <li>• The site forms effective physical and visual separation between Goring and Ferring.</li> <li>• Contributes to the rurality and undeveloped character of the coastline.</li> <li>• Visible from SDNP and provides a visual link between the NP and undeveloped coastline.</li> <li>• Development could potentially result in the loss of accessible open space.</li> </ul>	
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SA Objective	Indicator	Chatsmore Farm	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located within a Source Protection Zone. However the Ferring Rife flows through the middle of the site. Mitigation should be provided to ensure there is no deterioration in quality of the Ferring Rife and policy wording should promote enhancements.	Y
	Noise	The whole of the site experiences noise from the railway line to the south and the A259 to the north.	Y
Biodiversity	Sites, Habitats and Species	The Worthing Landscape Ecology Study 2015 describes the site as dominated by two arable fields of negligible conservation interest. Linear vegetative features are considered in combination to be of local wildlife value. The Ferring Rife runs through the centre of the site and along with the corridor of semi-natural habitats through which it flows, are considered to form a significant part of a wider habitat of district value. A small number of notable bird records also pertain to the site including Lapwing, Grey Partridge and Little Egret. Sussex Biodiversity Centre has records of water vole on the site, a legally protected species which receives full protection under the Wildlife and Countryside Act (WCA).	Y
Land and Soils	Potentially Contaminated Land	Non PCL	G
	Agricultural Land	Grade 1	R
Water Management	Flooding from Rivers and Sea	Partly Flood Zone 2/3. Development should be located in areas of Flood Zone 1 only. Records show historic flooding adjacent to the site.	Y
	Surface Water	Parts of the site are in areas with a high chance of flooding from surface water.	R
	Groundwater	The site is partly in an area considered to be at a high risk of groundwater flooding.	R
Landscape and Character	Setting of South Downs National Park	Adjacent to the South Downs National Park to the north. The Landscape and Ecology Study 2017 states that the site forms an undeveloped setting to the SDNP and is prominent in views from Highdown Hill within the SDNP and visible from Cissbury Ring. The south western corner is more contained and has less of a contribution to the setting of the SDNP than the main open gap.	R
	Coalescence	The Landscape and Ecology Study 2017 states that the site provides an essential sense of separation between Goring and Ferring despite development to the south. It acknowledges that although the south western corner of the site is part of the wider separation between settlements, it has a less prominent contribution than the rest of the site.	R
	Undeveloped coastline and countryside	Located outside of the Built Up Area Boundary. The Worthing Landscape and Ecology Study 2017 states that the site provides an open aspect to surrounding settlements in an otherwise developed coastal plain and in connection to the SDNP.	R
Built Environment	Derelict sites	Greenfield site.	R

Historic Environment	Designated Heritage Assets	The Highdown Conservation Area and Highdown Gardens are located in the South Downs National Park north of the site over the A259. Highdown Gardens are the only area in Worthing on the Register of Historic Parks and Gardens by English Heritage for its special historic interest.	Y
	Archaeology	Within an Archaeological Notification Area for multi-period settlement activity, Northbrook College, Worthing.	R
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within a 15min walk of semi-natural greenspace and parks and gardens. Across the A259 is High Down Recreation Ground, Highdown Gardens and High Down North Field. However there are no allotments within the 10 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	IMD rank in Worthing 2015 was 22 out of 65.	G
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (The Phoenix Surgery) is approximately 1650m away.	Y
	Proximity to Libraries	The nearest library (Goring Library) is approximately 1200m away.	Y
Education	Proximity to primary schools (infant, junior)	The Laurels Primary School and Goring Church of England Primary School are both approximately 1.3km away.	Y
	Proximity to secondary schools	Chatsmore Catholic High School is approximately 400m away.	G
Economy	Key office location or industrial estate	The site is undeveloped - would not result in any potential loss of employment space.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is not within 800m of the town centre or a district or local centre.	Y
Travel and Access	Proximity to train station	Within 400m of Goring train station.	G
	Proximity to cycle routes	The site is approximately 480m north of the town centre - Goring route (non traffic free) and 550m south west of the Littlehampton Road route (non traffic free).	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>The site is in a sustainable location within walking distance of Goring train station.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>The Ferring Rife flows through the centre of the site.</li> <li>Grade 1 Agricultural Land.</li> <li>Parts of the site are in Flood Zone 3 and have a high chance of surface water and groundwater flooding.</li> <li>Prominent in views from SDNP and considered to form part of its undeveloped setting.</li> <li>Provides an essential sense of separation between Goring and Ferring.</li> <li>Within an area containing recorded archaeological remains.</li> </ul>			R

SA Objective	Indicator	Caravan Club, Titnore Way	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	The Worthing Landscape & Ecology Study 2017 describes the site as	Y

		comprising of a caravan park dominated by regularly mown amenity grassland of negligible/less than local ecological interest. The habitats of greatest value associated with the site are those forming part of Titnore & Goring Woods Complex Local Wildlife Site (formerly Site of Nature Conservation Importance) which borders the site to the north and west, including ancient woodland, treelines and scrub bordering northern and western site boundaries, considered to be of borough/district value. Woodland on the south-eastern site margin forms a habitat corridor considered of moderate local value. Any development proposals for the site should seek to maintain the integrity of habitats associated with the Titnore & Goring Woods Complex Local Wildlife Site through vegetated buffers, connective habitat and other mitigation measures.	
Land and Soils	Potentially Contaminated Land	Non PCL	G
	Agricultural Land	Grade 3, with a small section of Grade 2.	R
Water Management	Flooding from Rivers and Sea	Flood Zone 1	G
	Surface Water	The site includes areas with a medium chance of flooding from surface water. Areas along the northern boundary have a high chance of flooding from surface water.	Y
	Groundwater	The site is in an area considered to be at a medium risk of groundwater flooding.	Y
Landscape and Character	Setting of South Downs National Park	The Landscape and Ecology Study 2017 states that the site is separated from the National Park by a sports facility to the west. It concludes that the site makes no significant contribution to the setting of the National Park to the north or west.	G
	Coalescence	The Landscape and Ecology Study 2017 states the site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located outside of the Built Up Area Boundary. However the Landscape and Ecology Study 2017 states that the site would form a logical inclusion within the settlement pattern.	R
Built Environment	Derelict sites	Greenfield site. A caravan club is currently located on the site.	R
Historic Environment	Designated Heritage Assets	Flint Cottage, a Grade II Listed Building is located 150m to the west of the site.	Y
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within a 15min walk of semi-natural greenspace and parks and gardens. Adjacent to the site is Fulbeck Avenue semi/natural greenspace.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 3rd most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (The Mayflower Surgery, The Strand Surgery and Victoria Road Practice) is approximately 1300m away.	Y
	Proximity to Libraries	The nearest library (Durrington Library) is approximately 1900m away.	Y
Education	Proximity to primary schools (infant, junior)	The Laurels Primary School is approximately 400m away.	G
	Proximity to secondary schools	Chatsmore Catholic High School and Durrington High School are both within 2km. Chatsmore is approximately 1.7km away.	Y
Economy	Key office location or industrial estate	The site is currently occupied by a caravan club - would not result in any potential loss of employment space.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town	The site is within 800m of West Durrington District Centre.	G

	centres, district centres and local centres		
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The site is approximately 600m north west of the Littlehampton Road route (non traffic free).	G
<b>Conclusions</b> Opportunities: • The site is in Flood Zone 1.  Constraints: • Titnore & Goring Woods Complex Local Wildlife Site (including ancient woodland) borders the site.			Y

SA Objective	Indicator	Land West of Fulbeck Avenue	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	The Worthing Landscape & Ecology Study 2017 describes the site as comprising of derelict land dominated in the north by outgrown scrub with a small number of mature trees considered to be of low local value, and in the south by recently-established grassland, tall ruderal vegetation and scattered scrub habitats. The habitats of greatest value associated with the site include treelines and scrub bordering the north-western site boundary which form part of Titnore & Goring Woods Complex Local Wildlife Site, considered overall to be of district value for wildlife. A flowing drain runs east to west through the centre of the site from a culvert under Fulbeck Avenue into the lake to the north-west of the site the linear aquatic habitat it provides is considered to be of moderate local value. Sussex Biodiversity Centre has records of slow worm on the site, a legally protected species under the Wildlife and Countryside Act (WCA).	Y
Land and Soils	Potentially Contaminated Land	Non PCL	G
	Agricultural Land	Grade 3, with a small section of Grade 2.	R
Water Management	Flooding from Rivers and Sea	Flood Zone 1	G
	Surface Water	Parts of the site are in areas with a high chance of flooding from surface water.	R
	Groundwater	The site is in an area considered to be at a medium risk of groundwater flooding.	Y
Landscape and Character	Setting of South Downs National Park	The southern half of the site is separated from the National Park by the caravan club and area of sports facilities and is considered to make a limited contribution to the setting of the SDNP. However, the Worthing Landscape and Ecology Study 2017 states that trees on the northern half of the site are identifiable from the SDNP and are seen in association with further woodland to the west forming part of the eastern extent of wooded area with the southern setting to the National Park. However, the southern part of the site has a limited contribution to the setting of the NP.	Y
	Coalescence	The Landscape and Ecology Study 2017 states the site makes no	G

		contribution to the separation between significant areas of settlement.	
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary adjacent to countryside. The Worthing Landscape and Ecology Study 2017 states that the southern half of the site is on the edge of existing settlement however woodland on the northern half provides a degree of rurality to the surrounding landscape.	G
Built Environment	Derelict sites	Greenfield site	R
Historic Environment	Designated Heritage Assets	Flint Cottage, a Grade II Listed Building is located 350m to the west of the site.	G
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site forms the Fulbeck Avenue natural and semi-natural greenspace. There is also Highdown Gardens within walking distance. The Study identifies there is a deficit in the quantity of natural and semi-natural greenspace available in this ward. It rates the site as low for quality and value.	R
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 3rd most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (The Mayflower Surgery, The Strand Surgery and Victoria Road Practice) is approximately 1150 m away.	Y
	Proximity to Libraries	The nearest library (Durrington Library) is approximately 1700m away.	Y
Education	Proximity to primary schools (infant, junior)	The Laurels Primary School is approximately 300m away, Hawthorns Primary School is approximately 700m away.	G
	Proximity to secondary schools	Chatsmore Catholic High School and Durrington High School are both within 2km. Durrington High School is approximately 1.6km away.	Y
Economy	Key office location or industrial estate	The site is undeveloped - would not result in any potential loss of employment space.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within 800m of West Durrington District Centre.	G
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The site is approximately 600m north west of the Littlehampton Road route (non traffic free).	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>• The site is in Flood Zone 1.</li> <li>• Located within the Built Up Area Boundary</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>• Treelines and scrub forming the northwestern site boundary from part of the Titnore &amp; Goring Woods Complex Local Wildlife Site.</li> <li>• Parts of the site have a high chance of surface water flooding.</li> <li>• Development would result in the loss of Natural / Semi-Natural accessible greenspace, though this is assessed as being of low quality and value.</li> </ul>			Y
<b>SA Objective</b>	<b>Indicator</b>	<b>Land East of Titnore Road</b>	<b>Score</b>
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y

	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
	Noise	The site is not within an area identified as experiencing significant road or rail noise.	G
Biodiversity	Sites, Habitats and Species	The Worthing Landscape & Ecology Study 2017 describes the site as dominated by arable land. The habitats of greatest value form part of the Titnore and Goring Woods Local Wildlife Site, including the strip of mixed woodland in the central area of the site, damp semi-improved grassland, hedgerow, ditches and brook, and offsite ancient woodland bordering the site boundaries. These are considered to be of district value. There are records of grass snake pertaining to the site. Development will need to avoid loss of habitats associated with Titnore & Goring Woods and maintain the integrity of these habitats.	Y
Land and Soils	Potentially Contaminated Land	Non PCL	G
	Agricultural Land	Grade 3	R
Water Management	Flooding from Rivers and Sea	Flood Zone 1	G
	Surface Water	There is a low or very low chance of flooding from surface water.	G
	Groundwater	The site is in an area considered to be at a medium risk of groundwater flooding.	Y
Landscape and Character	Setting of South Downs National Park	The site is adjacent to the South Downs National Park to the north and west. The Landscape and Ecology Study 2017 states that the site forms part of the immediate setting to the National Park.	R
	Coalescence	The Landscape and Ecology Study 2017 states the site forms no visual or physical separation between settlements.	G
	Undeveloped coastline and countryside	Located within the Built Up Area Boundary adjacent to the National Park. However the Landscape and Ecology Study 2017 states the extensive woodland to the north and west would provide a robust settlement edge if the site was to be developed.	G
Built Environment	Derelict sites	Greenfield site.	R
Historic Environment	Designated Heritage Assets	The Castle Goring Conservation Area is located to the north west of the site. The nearest Listed Buildings are over 200m away from the north and south of the site.	Y
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site is within a 15min walk of semi-natural greenspace and parks and gardens with Fulbeck Avenue natural and semi-natural, Highdown Gardens and High Down North Field and Recreation Ground located nearby. However there are no allotments within the 10 minute walk standard or amenity greenspace within the 5 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	Ranked as the 3rd most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (The Mayflower Surgery, The Strand Surgery and Victoria Road Practice) is approximately 1600m away.	Y
	Proximity to Libraries	The nearest library (Durrington Library) is approximately 2000m away.	Y
Education	Proximity to primary schools (infant, junior)	The Laurels Primary School is approximately 700m away. However a new school is planned as part of the West Durrington development.	G
	Proximity to secondary schools	Chatsmore Catholic High School is approximately 1.9km away.	Y
Economy	Key office location or	The site is undeveloped - would not result in any potential loss of	G

	industrial estate	employment space.	
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within 800m of West Durrington District Centre.	G
Travel and Access	Proximity to train station	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	The site is approximately 900m north west of the Littlehampton Road route (non traffic free).	G
<b>Conclusions</b> <b>Opportunities:</b> <ul style="list-style-type: none"> <li>The site is in Flood Zone 1.</li> </ul> <b>Constraints:</b> <ul style="list-style-type: none"> <li>Titnore &amp; Goring Woods Complex Local Wildlife Site (including ancient woodland) runs through the centre of the site and borders the site.</li> <li>The site is adjacent to the SDNP and is considered to form part of its immediate setting.</li> </ul>			Y

SA Objective	Indicator	Land at Dale Road	Score
Environmental Quality	Worthing Air Quality Management Area (AQMA)	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	Not located within a Source Protection Zone. However the Teville Stream flows along the sites western boundary. There may be opportunities through development to provide enhancements to the stream to help it meet good ecological potential as required under WFD policy wording should promote this.	Y
	Noise	The site experiences some noise associated with the railway line to the north.	Y
Biodiversity	Sites, Habitats and Species	The Worthing Landscape & Ecology Study 2017 describes the site as a derelict former landfill. The habitats of greatest value are the drainage channels along the northern and western site boundaries and the corridors of semi-natural habitat through which they flow which are considered to form part of a wider network of district value. The drainage channels are associated with the Teville Stream, a main river and waterbody designated under the Water Framework Directive. Development should seek to maintain the ecological function of water channels and where possible enhance these features.	Y
Land and Soils	Potentially Contaminated Land	Significant levels of contamination likely to be present on site due to previous use as a landfill.	R
	Agricultural Land	Former landfill.	G
Water Management	Flooding from Rivers and Sea	Partly Flood Zone 2/3. Development should be located in areas of Flood Zone 1 only. Records show historic flooding in the vicinity of the site.	Y
	Surface Water	Parts of the site are in areas with a medium chance of flooding from surface water.	Y
	Groundwater	The site is in an area considered to be at a medium risk of groundwater flooding.	Y
Landscape and Character	Setting of South Downs National Park	The site is relatively distant from the National Park. The Landscape and Ecology Study 2017 states that the site forms a very limited part of the distant southern setting to the Park, forming a break in the built up area visible from the National Park.	Y
	Coalescence	The Landscape and Ecology Study 2017 states that the site forms the only separation between East Worthing and Lancing at one of the	R



		narrowest points of the gap between the two settlements.	
	Undeveloped coastline and countryside	Located outside of the Built Up Area Boundary. The Landscape and Ecology Study 2017 states that the site is located beyond the existing edges of Worthing and Lancing within the gap. The site is raised up slightly above surrounding ground detached from the existing settlement pattern.	R
Built Environment	Derelict sites	Undeveloped former landfill site.	R
Historic Environment	Designated Heritage Assets	The site does not contain and is not adjacent to any designated heritage assets.	G
	Archaeology	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	The site is adjacent to Chesswood allotments to the west and Brooklands Pleasure Park and boating lake to the south east. However there are no parks and Gardens within the 15 minute walk standard.	G
Crime and Public Safety	Indices of Multiple Deprivation	IMD rank in Worthing 2015 was 25 out of 65.	G
Communities	Proximity to doctor's Surgeries	The site is not within 800m of a doctor surgery. The nearest surgery (Selden Medical Centre) is approximately 1300m away.	Y
	Proximity to Libraries	The nearest library (Broadwater Library) is approximately 1500m away	Y
Education	Proximity to primary schools (infant, junior)	Lyndhurst First School is approximately 900m away. Chesswood Junior School is 1.2km away.	G
	Proximity to secondary schools	St Andrews Church of England High School for Boys, Bohunt, Davison Church of England Comprehensive School for Girls and Sir Robert Woodard Academy are all within 2km. Davison is the nearest school approximately 800m away.	G
Economy	Key office location or industrial estate	The site is undeveloped. It was formerly used as a landfill - would not result in any potential loss of employment space.	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	The site is within 800m of Ham Road local centre.	G
Travel and Access	Proximity to train station	Within 800m of East Worthing train station.	G
	Proximity to cycle routes	The site is approximately 900m north of the South Coast route (traffic free)	G
<b>Conclusions</b> <b>Opportunities:</b> The site is in a sustainable location within walking distance of East Worthing train station.  <b>Constraints:</b> <ul style="list-style-type: none"> <li>• The Teville Stream flows along the site's western boundary.</li> <li>• Significant levels of contaminated land.</li> <li>• Parts of the site are in Flood Zone 3.</li> <li>• The site is located in the gap forming the only separation between East Worthing and Lancing.</li> </ul>			R

## APPENDIX D2: OPTIONS APPRAISAL

	<b>Policy SP2: Spatial Strategy</b>	
	The Worthing Housing Study (2015) highlighted the level of local need for new housing. Due to this and the limited land available, the option of allocating edge of town (greenfield) sites in addition to town centre (brownfield) sites was identified and presented as part of the Issues and Options consultation.	
<b>Options</b>	<b>Option 1: Brownfield only</b>	<b>Option 2: Brownfield and Greenfield</b>
1. Environmental Quality	+	-
	Developing on brownfield sites only presents an opportunity to improve the environmental quality of these sites by implementing pollution prevention measures and SuDS to reduce pollution and help improve water quality. However it is unlikely that new development will be able to improve air quality and therefore unlikely to reduce health risks associated with pollution.	Developing on both brownfield and greenfield sites brings the positive benefits in terms of improving the environmental quality of brownfield sites. However, development on greenfield sites has the potential to impact on the higher environmental quality of these sites.
2. Biodiversity	/	-
	Brownfield only is less likely to result in the loss of biodiversity, however it is recognised that some brownfield sites are suitable for providing mosaic habitats. Brownfield development also presents the opportunity to create and enhance existing biodiversity on these sites and improve connectivity between sites.	Development of brownfield and greenfield sites is more likely to result in a loss of habitat and has the potential to cause habitat fragmentation.
3. Land and Soils	+	-
	Redeveloping brownfield sites presents an opportunity to bring vacant land back into use, increasing densities and make the most effective use of the land available. This also presents an opportunity to remediate contaminated land and protect agricultural land.	Whilst redevelopment of brownfield sites present an opportunity to make the most effective use of the land available and support the remediation of contaminated land, greenfield sites particularly those around Worthing may result in the loss of the best and most versatile agricultural land.
4. Energy	/	/
	Allows older buildings to be replaced with more sustainable buildings. However demolition of sites would result in more construction waste compared with greenfield sites.	Developing brownfield and greenfield sites as opposed to just brownfield sites doesn't bring any additional positive or negative effects.
5. Water Management	-	+
	By allocating brownfield sites only the sites available are likely to be fewer and given the coastal location of the town centre may not present the best option to direct development to areas of lowest flood risk.	Developing brownfield and greenfield sites would enable development to be directed to areas of lowest flood risk first.
6. Landscape and Character	+	-
	Brownfield sites are normally within the Built Up Area and so development is likely to respect existing settlement patterns and have a minimal impact on local landscape character and sensitivity.	Developing some greenfield sites may have the potential to negatively impact the character and quality of natural landscapes and settlement patterns resulting in coalescence. The selection of sites should take account of landscape evidence and

		where appropriate incorporate mitigation measures.
7. Built Environment	+	+
	The redevelopment of vacant or derelict sites presents an opportunity to enhance the character of the local built environment and promote high quality urban design.	Developing brownfield and greenfield sites both present opportunities to enhance the character of the local built environment and promote high quality design.
8. Historic Environment	+	/
	The sympathetic redevelopment of brownfield sites can improve and enhance the setting of heritage assets through appropriate design.	The sympathetic redevelopment of sites can improve and enhance the setting of heritage assets through appropriate design. However the development of currently undeveloped greenfield sites could impact on the setting of nearby heritage assets.
9. Healthy Lifestyles	0	?
	Developing brownfield sites only would have no impact on healthy lifestyles.	Developing on brownfield and greenfield sites is unlikely to impact on healthy lifestyles however it will be important to ensure that the development of greenfield sites does not result in the loss of open space or Public Rights Of Way.
HIA	0	?
	Developing brownfield sites only would have no impact on healthy lifestyles.	Developing on brownfield and greenfield sites is unlikely to impact on healthy lifestyles however it will be important to ensure that the development of greenfield sites does not result in the loss of open space or Public Rights Of Way. The potential loss of open space or Public Rights of Way could reduce opportunities for people to lead healthy lifestyles through active recreation, leisure and social purposes.
EqIA	0	?
	Developing brownfield sites only would have no impact upon any of the EqIA protected characteristics.	Developing on brownfield and greenfield sites is unlikely to impact on healthy lifestyles however it will be important to ensure that the development of greenfield sites does not result in the loss of open space or Public Rights Of Way. The potential loss of open space or Public Rights of Way could reduce opportunities for people to lead healthy lifestyles through active recreation, leisure and social purposes. This could potentially impact upon the health and well-being of young people, elderly people and those with disabilities who may be reliant on open spaces for their health and also to help reduce social isolation. It is considered that the EqIA protected characteristics 'age' and 'disability' could be affected.
10. Crime and Public Safety	0	0
	Developing brownfield sites only would have no impact on crime and public safety.	Developing on brownfield and greenfield sites would have no impact on crime and public safety
HIA	0	0
	Developing brownfield sites only would have no impact on crime and public safety.	Developing on brownfield and greenfield sites would have no impact on crime and public safety

<b>EqlA</b>	<b>0</b>	<b>0</b>
	Developing brownfield sites only would have no impact upon any of the EqlA protected characteristics.	Developing on brownfield and greenfield would have no impact upon any of the EqlA protected characteristics.
11.Housing	-	+
	Brownfield sites are generally small so more likely to deliver flats rather than family houses. By restricting development to these sites the Plan will be limited in the amount of housing it can provide.	Developing both brownfield and greenfield sites presents the best opportunity to meet local need as far as possible, whilst providing the most appropriate housing mix across a variety of sites.
<b>EqlA</b>	-	+
	Brownfield sites are generally small so more likely to deliver flats rather than family houses. By restricting development to these sites the Plan will be limited in the amount of housing it can provide. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'. In addition, flats may not be wholly accessible / suitable for young children, elderly, those living with dementia and those with disabilities.	Developing both brownfield and greenfield sites presents the best opportunity to meet local need as far as possible, whilst providing the most appropriate housing mix across a variety of site therefore this option would support the EqlA protected characteristics 'age', 'disability' and 'race'.
12.Communities	/	+
	Developing brownfield sites may be suitably located to integrate within existing communities. However development may increase pressure on existing local services and facilities.	Developing brownfield and greenfield sites presents the best opportunity to deliver a wide range of uses including providing new and enhanced community facilities.
<b>HIA</b>	/	+
	Developing brownfield sites may be suitably located to integrate within existing communities and therefore provide opportunities for social interaction as well as being able to access social facilities. However development may increase pressure on existing local services and facilities which could potentially impact on the quality and provision of community facilities therefore subsequently impacting upon the health and well-being of the population.	Developing brownfield and greenfield sites presents the best opportunity to deliver a wide range of uses including providing new and enhanced community facilities which will therefore improve opportunities to achieve health and well-being outcomes.
<b>EqlA</b>	/	+
	Developing brownfield sites may be suitably located to integrate within existing communities. However development may increase pressure on existing local services and facilities which could potentially impact on the quality and provision of community facilities therefore subsequently impacting upon the health and well-being of the population. This in turn could impact on the EqlA protected characteristics 'age', 'disability', 'pregnancy' and 'race'.	Developing brownfield and greenfield sites presents the best opportunity to deliver a wide range of uses including providing new and enhanced community facilities and would support EqlA protected characteristics 'age', 'disability', 'pregnancy' and 'race'.
13.Education	/	+

	Developing brownfield sites only will mean there may be less land available to accommodate new schools and education facilities. However where additional demand arises this may be met through contributions to the expansion of existing facilities.	Developing brownfield and greenfield sites presents the best opportunity to deliver a wider range of uses including the provision of new educational facilities.
<b>EqlA</b>	<b>0</b>	<b>0</b>
	Developing brownfield sites only would have no impact on any of the EqlA protected characteristics as additional demand for school places could be met through contributions to the expansion of existing facilities.	Developing on brownfield and greenfield would have no impact on any of the EqlA protected characteristics.
14.Economy	<b>-</b>	<b>+</b>
	Developing brownfield sites only will mean the potential sites available for development will be limited making it more difficult to deliver sufficient employment space alongside homes. This could impact on local economic growth.	Developing brownfield and greenfield sites presents the best opportunity to deliver a wider range of uses enabling new development to support economic growth through the provision of new employment space.
<b>EqlA</b>	<b>-</b>	<b>+</b>
	Developing brownfield sites only will mean the potential sites available for development will be limited making it more difficult to deliver sufficient employment space alongside homes. This could impact on local economic growth and potentially impact on the quality and provision of employment opportunities. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may have lower levels of skills attainment / qualifications and be on lower incomes. It is likely that there will be a negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'.	Developing brownfield and greenfield sites presents the best opportunity to deliver a wider range of uses enabling new development to support economic growth through the provision of new employment space facilities that would support the EqlA protected characteristics 'age', 'disability' and 'race'.
15.Town and Local Centres	<b>-</b>	<b>+</b>
	Developing brownfield sites only will mean there may be less potential sites available increasing the pressure for sites in town and local centres to deliver housing at the expense of retail and other town centre uses and local services.	Developing brownfield and greenfield sites presents the best opportunity to deliver a wider range of uses including maximising the ability of sites in the town centre to support its vitality and viability.
16.Travel and Access	<b>+</b>	<b>+</b>
	Brownfield sites particularly those in and around the town centre are often in sustainable locations with good access to services and sustainable modes of transport thus offering opportunities to facilitate active travel.	Both brownfield and greenfield sites are able to promote accessibility. Brownfield sites are often in more sustainable locations with good access to local services and sustainable modes of transport thus offering opportunities to facilitate active travel.
<b>Mitigation</b>	Maximise densities to achieve a mix of uses as far as possible.	Environmental evidence should be considered when selecting appropriate sites for development
<b>Conclusions</b>	Option 1 scores as having positive effects across a number of environmental objectives. However this needs to be balanced against negative scores for housing, economy, town and local centres and water management reflecting how this option will reduce the number of potential sites for development.	Option 2 scores positively across the majority of social and economic objectives. A number of negative environmental effects have been identified associated with development of greenfield sites.

<b>Conclusions – HIA / EqIA</b>	There a number of negative effects in relation to housing and economy. There are also a number of neutral effects concerning communities and education whereas option 2 scores positively.	Option 2 scores positively across the majority of the social and economic objective.
<b>Recommendation</b>	Overall option 2 scores more positively due to the larger number of potential sites and the opportunities this brings to meet the widest range of needs by enabling a greater mix of uses to be accommodated across a variety of sites.	

<b>Policy SP3: Development Sites</b>			
<b>Options</b>	<b>Option 1: Need led figure</b>	<b>Option 2: Supply led figure</b>	<b>Option 3: Evidence led figure</b>
	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 figure of 12,801. This option would result in 11,295 homes being allocated giving an overall housing supply figure of 14,674 homes over the Plan period.	This option assumes all potential sites (including omission sites and protected sites) will be allocated for development at an appropriate density to deliver housing and where suitable a mix of uses. This option would result in 2,023 homes being allocated giving an overall housing supply figure of 5,402 homes over the Plan period. This gives a shortfall against the Local Housing Need figure (12,801) of 7,399.	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. This option would result in 853 homes being allocated giving an overall housing supply figure of 4,232 homes over the Plan period. This gives a shortfall against the Local Housing Need figure (12,801) of 8,569.
1. Environmental Quality	-	?	?
	It is likely that any significant amount of development will have the potential to increase traffic congestion, worsening air quality. By developing on all sites at such high densities there will be a loss of natural habitats and green space that currently provides air purification and water quality improvements which could result in increased pollution.	It is likely that any significant amount of development will have the potential to increase traffic congestion, worsening air quality. By developing on all sites there will be a loss of natural habitats which may result in a deterioration in environmental quality, it may be possible for site layout to incorporate some enhancements to deliver environmental net gains and reduce pollution however this cannot be assumed.	It is likely that any significant amount of development will have the potential to increase traffic congestion, worsening air quality. As this option excludes a number of greenfield sites these would be left in their current natural state reducing the loss of habitats and green space compared with the other options. Furthermore it may be possible on those sites that are allocated for developments to incorporate some enhancements to deliver environmental net gains and improvements in environmental quality to reduce pollution however this cannot be assumed.
2. Biodiversity	--	--	-
	By developing on all available sites within the Plan area this would result in a loss of biodiversity, green infrastructure and habitat corridors especially in the gaps between Ferring - Worthing	By developing on all available sites within the Plan area this would result in a loss of biodiversity, green infrastructure and habitat corridors especially in the gaps between Ferring - Worthing	By developing on a number of greenfield sites around Worthing this would result in a loss of biodiversity, green infrastructure and habitat corridors however a number of sites and the habitats on

	and Worthing - Sompting/Lancing. Furthermore the densities and scale of development proposed means it is unlikely to be possible to deliver any gains in biodiversity green infrastructure as part of developments.	and Worthing - Sompting/Lancing. Opportunities should be taken wherever possible to deliver a net gain in biodiversity and deliver or enhance green infrastructure networks as part of developments.	them would remain undeveloped. Opportunities should be taken wherever possible to deliver a net gain in biodiversity and deliver or enhance green infrastructure networks.
3. Land and Soils	-	-	/
	All available options would improve land efficiency by reusing previously developed land. However this option would result in the loss of all available agricultural land that is defined as the best and most versatile.	All available options would improve land efficiency by reusing previously developed land. However this option would result in the loss of all available agricultural land that is defined as the best and most versatile.	All available options would improve land efficiency by reusing previously developed land. This option would retain some of the best and most versatile available agricultural land around Worthing.
4. Energy	0	0	0
	There is no direct impact between this option and objective.	There is no direct impact between this option and objective.	There is no direct impact between this option and objective.
5. Water Management	-	-	-
	All available options include some sites located in areas of high flood risk or identified as at risk of flooding from other sources. In addition delivering more housing is likely to result in increased pressure on water resources in an area of serious water stress. The high densities required through this option mean there may be less space available making the use of Sustainable Drainage Systems more challenging.	All available options include some sites located in areas of high flood risk or identified as at risk of flooding from other sources. In addition delivering more housing is likely to result in increased pressure on water resources in an area of serious water stress. Developments should ensure there is adequate space given to Sustainable Drainage Systems to mimic natural drainage and reduce flood risk overall.	All available options include some sites located in areas of high flood risk or identified as at risk of flooding from other sources. In addition delivering more housing is likely to result in increased pressure on water resources in an area of serious water stress. Developments should ensure there is adequate space given to Sustainable Drainage Systems to mimic natural drainage and reduce flood risk overall.
6. Landscape and Character	--	--	/
	This option would result in development on a number of sites which the Landscape and Ecology Study conclude would impact on the setting of the South Downs National Park and existing settlement patterns resulting in coalescence. The high densities and associated building heights is likely to result in significant impact on the character of the local area and National Park.	This option would result in development on a number of sites which the Landscape and Ecology Study conclude would impact on the setting of the South Downs National Park and existing settlement patterns resulting in coalescence.	The Landscape and Ecology Study identifies mitigation which if implemented means development should not have a significant negative impact on local landscape and character.
7. Built Environment	+	+	+
	By redeveloping vacant brownfield sites particularly those in or near the town centre such as at Lyndhurst Road, Union Place South and	By redeveloping vacant brownfield sites and developing sites at appropriate densities there are opportunities through design to	By redeveloping vacant brownfield sites and developing sites at appropriate densities there are opportunities through



	Teville Gate there are opportunities through design to enhance the character and quality of the built environment. Developing greenfield sites even at high densities would not necessary impact the quality of the built environment	enhance the character and quality of the built environment. Developing greenfield sites would not necessary impact the quality of the built environment	design to enhance the character and quality of the built environment. Developing greenfield sites would not necessary impact the quality of the built environment
	-	?	?
8. Historic Environment	A number of sites are located in close proximity to Listed Buildings and Conservation Areas. Developing sites at high densities without space for appropriate buffer zones may result in unsympathetic development which in some cases may have the potential to adversely affect their setting.	A number of sites are located in close proximity to Listed Buildings and Conservation Areas, it will be important that these are developed sympathetically. The redevelopment of some brownfield sites may bring opportunities to enhance the setting of Heritage Assets.	A number of sites are located in close proximity to Listed Buildings and Conservation Areas, it will be important that these are developed sympathetically. The redevelopment of some brownfield sites may bring opportunities to enhance the setting of Heritage Assets.
	-	/	/
9. Healthy Lifestyles	This would result in the loss of some sites identified as providing low quality accessible open space. The high densities required mean it is unlikely that any open space could be provided on site as part of developments.	This would result in the loss of some sites identified as providing accessible open space. However there may be opportunities for open space to be provided as part of some developments.	This would result in the loss of some sites identified as providing low quality accessible open space. However there may be opportunities for open space to be provided as part of some developments.
	-	/	/
HIA	This would result in the loss of some sites identified as providing low quality accessible open space. The high densities required mean it is unlikely that any open space could be provided on site as part of developments. Subsequently, this would result in a negative impact on healthy lifestyles due to the lack of available open spaces for physical recreation, relaxation, leisure and social purposes.	This would result in a neutral effect on healthy lifestyles due to the lack of available open spaces for physical recreation, relaxation, leisure and social purposes. However, the potential to provide open space as part of a new development will provide opportunities to encourage people to lead healthy lifestyles.	This would result in the loss of some sites identified as providing accessible open space. However there may be opportunities for open space to be provided as part of some developments. This would result in a neutral effect on healthy lifestyles due to the lack of available open spaces for physical recreation, relaxation, leisure and social purposes. However, the potential to provide open space as part of a new development will provide opportunities to encourage people to lead healthy lifestyles.
	-	/	/
EqIA	The potential loss of low quality accessible open space could reduce opportunities for people to lead healthy lifestyles through active recreation, leisure and social purposes. This could potentially impact upon the health and well-being of young people, elderly people and	This would result in a neutral effect on healthy lifestyles due to the lack of available open spaces for physical recreation, relaxation, leisure and social purposes. However, the potential to provide open space as part of a new development will provide opportunities to encourage	This would result in a neutral effect on healthy lifestyles due to the lack of available open spaces for physical recreation, relaxation, leisure and social purposes. However, the potential to provide open space as part of a new development will provide



	those with disabilities, pregnant women and ethnic minorities who may be reliant on open spaces for their health and also to help reduce social isolation. It is considered that the EqIA protected characteristics 'age', 'disability' 'pregnancy' and 'race' could be affected.	people to lead healthy lifestyles and will support EqIA protected characteristics 'age', 'disability' 'pregnancy' and 'race' could be affected.	opportunities to encourage people to lead healthy lifestyles and will support EqIA protected characteristics 'age', 'disability' 'pregnancy' and 'race' could be affected.
	+	+	+
10.Crime and Public Safety	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion.	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion.	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion.
	+	+	+
HIA	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion. This has a positive effect on the health and well-being of the local community.	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion. This has a positive effect on the health and well-being of the local community.	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion. This has a positive effect on the health and well-being of the local community.
	+	+	+
EqIA	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion. This has a positive effect on all of the EqIA protected characteristics.	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion. This has a positive effect on all of the EqIA protected characteristics.	Redevelopment of vacant or derelict sites could help improve security and remove fear of crime as well as promoting social cohesion. This has a positive effect on all of the EqIA protected characteristics.
	+	+	-
11.Housing	This option would provide a level of housing which best meets local need however the high densities required could impact on the type and mix of homes provided.	By developing on all available sites this option goes seeks to deliver the number and type of homes needed to meet local need as far as possible along with other uses.	There is a significant shortfall between the number of homes that would be delivered and the number of homes needed to meet local need. Minimum densities should ensure the development potential of sites is maximised whilst delivering an appropriate mix of uses.
	/	+	-
EqIA	This results in a neutral effect. Whilst the option will provide a level of housing which best meets local need such as those who require affordable housing, it is likely that there will be a negative impact on the EqIA protected characteristics 'age' and 'disability' as flats may not be	By developing on all available sites this option goes seeks to deliver the number and type of homes needed to meet local need as far as possible along with other uses.	This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a negative impact on the EqIA

	wholly accessible and suitable for for young children, elderly, those living with dementia and those with disabilities.		protected characteristics 'age', 'disability' and 'race'. In addition, flats may not be wholly accessible / suitable for young children, elderly, those living with dementia and those with disabilities.
12.Communities	-	?	?
	The number of new homes will mean it is likely that additional infrastructure will be required to support demand arising from developments. However at this level it is uncertain what will be required and where or how it will be accommodated. This will be assessed through options for individual sites. However the high densities require mean it is unlikely that any facilities could be accommodated onsite as part of developments.	The number of new homes will mean it is likely that additional infrastructure will be required to support demand arising from developments. However at this level it is uncertain what will be required and where or how it will be accommodated. This will be assessed through options for individual sites.	The number of new homes will mean it is likely that additional infrastructure will be required to support demand arising from developments. However at this level it is uncertain what will be required and where or how it will be accommodated. This will be assessed through options for individual sites.
HIA	-	?	?
	High density development may increase pressure on existing local services and facilities which could potentially impact on the quality and provision of community facilities therefore subsequently impacting upon the health and well-being of the population.	The number of new homes will mean it is likely that additional infrastructure will be required to support demand arising from developments. However at this level it is uncertain what will be required and where or how it will be accommodated therefore it is uncertain how this would impact on the health and well-being of the population. This will be assessed through options for individual sites.	The number of new homes will mean it is likely that additional infrastructure will be required to support demand arising from developments. However at this level it is uncertain what will be required and where or how it will be accommodated therefore it is uncertain how this would impact on the health and well-being of the population. This will be assessed through options for individual sites.
EqIA	-	?	?
	High density development may increase pressure on existing local services and facilities which could potentially impact on the quality and provision of community facilities therefore subsequently impacting upon the health and well-being of the population. This in turn could impact on the EqIA protected characteristics 'age', 'disability', 'pregnancy' and 'race'.	The number of new homes will mean it is likely that additional infrastructure will be required to support demand arising from developments. However at this level it is uncertain what will be required and where or how it will be accommodated therefore it is uncertain how this would impact upon the EqIA protected characteristics. This will be assessed through options for individual sites.	The number of new homes will mean it is likely that additional infrastructure will be required to support demand arising from developments. However at this level it is uncertain what will be required and where or how it will be accommodated therefore it is uncertain how this would impact upon the EqIA protected characteristics. This will be assessed through options for individual sites.
13.Education	0	0	0
	There is no direct link between this option and raising educational achievement and skills levels.	There is no direct link between this option and raising educational achievement and skills levels.	There is no direct link between this option and raising educational achievement and skills

			levels.
<b>EqlA</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no direct link between this option and upon the EqlA protected characteristics.	There is no direct link between this option and upon the EqlA protected characteristics.	There is no direct link between this option and upon the EqlA protected characteristics.
14.Economy	-	+	+
	The high densities required in residential developments mean it is unlikely that other uses could be provided. This would prevent further employment sites potentially stifling the local economy.	This option assumes mixed use development on appropriate sites and as such would not impact on economic growth. The greater scale of development would likely require more sites and consequently there may be more opportunities for economic development.	This option assumes mixed use development on appropriate sites and as such would support some economic development.
<b>EqlA</b>	-	+	+
	The high densities required in residential developments mean it is unlikely that other uses could be provided. This could impact on local economic growth and potentially impact on the quality and provision of employment opportunities. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may have lower levels of skills attainment / qualifications and be on lower incomes. It is likely that there will be a negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'.	This option assumes mixed use development on appropriate sites and as such would not impact on economic growth. The greater scale of development would likely require more sites and consequently there may be more opportunities for economic development which would support the EqlA protected characteristics 'age', 'disability' and 'race'.	This option assumes mixed use development on appropriate sites and as such would support some economic development which would support EqlA protected characteristics 'age', 'disability' and 'race'.
15.Town and Local Centres	?	+	+
	The redevelopment of key town centre sites with high density residential schemes may impact the vitality and viability of the town centre.	The redevelopment of key town centre sites will help ensure the vitality and viability of the town centre.	The redevelopment of key town centre sites will help ensure the vitality and viability of the town centre.
16.Travel and Access	?	?	?
	Some of the edge of town sites are further away from public transport links. However a number of sites including those in the town centre are in sustainable locations.	Some of the edge of town sites are further away from public transport links. However a number of sites including those in the town centre are in sustainable locations.	Some of the edge of town sites are further away from public transport links. However a number of sites including those in the town centre are in sustainable locations.
<b>Mitigation</b>	Include other policies within the Plan to encourage use of water efficiency measures, preserve and enhance heritage assets and to create and enhance green infrastructure networks and	Encourage delivery of mixed use developments where appropriate. Include other policies within the Plan to encourage use of water efficiency measures, and to create and enhance green	Include other policies within the Plan to encourage use of water efficiency measures, maximise densities where appropriate and to create and enhance green infrastructure

	corridors.	infrastructure networks and corridors.	networks and corridors.
<b>Conclusions</b>	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 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 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.
<b>Conclusions – HIA / EqIA</b>	The high densities required in Option 1 would result in very negative effects in terms of healthy lifestyles, communities and economy. However, there is a positive effect for crime and safety.	Option 2 scores positively for crime and safety, housing and economy. There is a neutral impact on healthy lifestyles.	Option 3 scores negatively for housing. There is a neutral impact on healthy lifestyles.
<b>Recommendation</b>	Option 3 is likely to result in less significant negative impacts.		

<b>Policy SP5: Local Gaps</b>				
	The suitability of specific sites and the extent to which they form Local Gap has been informed by the landscape evidence. This recommends that the following sites are designated as Local Gap:			
<b>Options</b>	<b>Brooklands Recreation Area</b>	<b>Goring Ferring Gap</b>	<b>Chatsmore Farm</b>	<b>Land east of proposed development (site A3) at Upper Brighton Road</b>
	<b>/</b>	<b>0</b>	<b>/</b>	<b>0</b>
1. Environmental Quality	Designating this site as Local Gap and therefore maintaining separation between settlements wouldn't have any specific impact on environmental quality. Improvements are currently underway to enhance the environmental quality of Brooklands Lake.	Designating this site as Local Gap and maintaining separation between settlements wouldn't have any specific impact on environmental quality.	Designating this site as Local Gap and therefore maintaining separation between settlements wouldn't have any specific impact in terms of protecting and improving air and water quality or reducing pollution / minimising health risks associated with pollution. However, resisting development at this location between Ferring and Goring may prevent an increase in urban runoff to the Ferring Rife. There therefore may be an indirect benefit to water	Designating this site as Local Gap and therefore maintaining separation between settlements wouldn't have any specific impact on environmental quality.

			quality.	
2. Biodiversity	/	/	+	/
	Designating this site as Local Gap wouldn't in itself impact on biodiversity; however it will indirectly continue to protect a range of habitats accommodated in this large open space including Brooklands Lake which is currently being enhanced.	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly preserve this area of open space protecting the existing habitats and species.	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly protect the Ferring Rife described as being of borough value in the Worthing Landscape and Ecology Study (2017) and habitats that support bird and water vole populations.	Designating this part of the site as Local Gap will indirectly preserve this area of open space protecting existing habitats and species.
3. Land and Soils	?	/	/	/
	Designating this site as Local Gap may potentially result in the loss of opportunities to remediate the former landfill in the north west part of the site that may have arisen through development.	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly preserve this area of Grade 2 Agricultural Land.	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly preserve this area of Grade 1 Agricultural Land	Designating this part of the site as Local Gap will indirectly preserve this small area of Grade 2 Agricultural Land.
4. Energy	0	0	0	0
	Designating this site as Local Gap would have no impact on energy use and climate change mitigation.	Designating this site as Local Gap would have no impact on energy use and climate change mitigation.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on this objective.	Designating this part of the site as Local Gap would have no impact on this objective.
5. Water Management	+	+	+	0
	Designating this site as Local Gap would direct development away from parts of the site that are at a high probability of flooding and protect this valuable water storage resource which reduces flood risk upstream during high tides.	Designating this site as Local Gap would direct development away from the site which includes areas that are at a high chance of flooding.	Designating this site as Local Gap and therefore maintaining separation between settlements would direct development away from parts of the site that are at a high probability of flooding from a number of different sources.	Designating this part of the site as Local Gap would have no impact on water management.
6. Landscape and Character	++	++	++	++
	Designating this site as Local Gap and therefore maintaining separation between settlements will protect this site which forms the main southern gap and only separation between Worthing and Lancing as viewed from the	Designating this site as Local Gap and therefore maintaining separation between settlements will help protect this site from development which provides effective physical and visual separation between Ferring and Goring at	Designating this site as Local Gap and therefore maintaining separation between settlements will help protect this site from development which provides an essential sense of separation between Ferring and Goring. It would also	Designating this part of the site as Local Gap will contribute to maintaining separation between Worthing and Sompting and prevent coalescence.

	railway line.	one of the few breaks from development along the coast. It would also have the indirect impact of protecting the visual link at this location from the coast to the National Park and the Parks visual setting.	protect the undeveloped setting to the National Park.	
7. Built Environment	++	++	++	+
	Designating this site as Local Gap and therefore maintaining separation between settlements will contribute to a continued sense of place and clear boundaries to Worthing and Lancing either side of the Gap.	Designating this site as Local Gap and therefore maintaining separation between settlements will contribute to a continued sense of place and clear boundaries to Ferring and Goring either side of the Gap.	Designating this site as Local Gap and therefore maintaining separation between settlements will contribute to a continued sense of place and clear boundaries to Ferring and Goring either side of the Gap.	Designating this part of the site as Local Gap will contribute to a continued sense of place and clear boundary to the edge of Worthing.
8. Historic Environment	0	++	+	0
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on the historic environment.	Designating this site as Local Gap and therefore maintaining separation between settlements may help preserve the setting of Goring Hall and the Former Stables which are Grade II Listed including its coastal aspect, distant views of the sea and views of the hall from the sea over open fields.	Designating this site as Local Gap may help preserve the setting of Highdown Gardens a registered historic park and garden. However it is recognised that these sites are separated by the dual carriageway.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on the historic environment.
9. Healthy Lifestyles	+	+	+	/
	Designating this site as Local Gap will maintain the open gap between Worthing and Lancing which will indirectly preserve this valuable open space.	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly protect areas of accessible public open space within and surrounding the site.	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly preserve the Public Right of Way which runs along the site's southern boundary and informal walking routes through the site.	Designating this part of the site as Local Gap will have no direct impact on healthy lifestyles given the size of the site.
HIA	+	+	+	/
	Designating this site as Local Gap will maintain the open gap between Worthing and Lancing which will indirectly bring preserve this valuable open space. This will support the health and well-being of the local	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly protect areas of accessible public open space within and surrounding the site	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly preserve the Public Right of Way which runs along the site's southern boundary and	Designating this part of the site as Local Gap will have no direct impact on healthy lifestyles given the size of the site.

	population and enable them to lead healthy lifestyles through active recreation, leisure and social purposes.	This will support the health and well-being of the local population and enable them to lead healthy lifestyles through active recreation, leisure and social purposes.	informal walking routes through the site. This will support the health and well-being of the local population and enable them to lead healthy lifestyles through active recreation, leisure and social purposes.	
<b>EqlA</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>/</b>
	Designating this site as Local Gap will maintain the open gap between Worthing and Lancing which will indirectly bring preserve this valuable open space. This will support the health and well-being of the local population and enable them to lead healthy lifestyles through active recreation, leisure and social purposes and therefore support all of the EqlA protected characteristics.	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly protect areas of accessible public open space within and surrounding the site This will support the health and well-being of the local population and enable them to lead healthy lifestyles through active recreation, leisure and social purposes and therefore support all of the EqlA protected characteristics.	Designating this site as Local Gap and therefore maintaining separation between settlements will indirectly preserve the Public Right of Way which runs along the site's southern boundary and informal walking routes through the site. This will support the health and well-being of the local population and enable them to lead healthy lifestyles through active recreation, leisure and social purposes and therefore support all of the EqlA protected characteristics.	Given the size of the site, designating this part of the site as Local Gap will have no direct impact on healthy lifestyles and therefore no direct impact on the EqlA protected characteristics.
<b>10.Crime and Public Safety</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on crime and public safety.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on crime and public safety.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on crime and public safety.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on crime and public safety.
<b>HIA</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on crime and public safety.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on crime and public safety.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on crime and public safety.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on crime and public safety.
<b>EqlA</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqlA protected	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqlA protected	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqlA protected	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqlA protected



	characteristics.	characteristics.	characteristics.	characteristics.
11.Housing	-	--	--	-
	Designating this site as Local Gap and therefore maintaining separation between settlements would mean delivery of housing on the site would be resisted further reducing the ability of the Plan to meet local housing need. However, a large portion of this site contains Brooklands Lake and the site is already in leisure / open space use and therefore not considered available.	Designating this site as Local Gap and therefore maintaining separation between settlements would mean delivery of housing on the site would be resisted further reducing the ability of the Plan to meet local housing need.	Designating this site as Local Gap and therefore maintaining separation between settlements would resist development of the site further reducing the ability of the Plan to meet local housing need.	Designating this part of site as Local Gap will reduce the amount of housing overall that can be provided on the wider development site. However this is unlikely to significantly impact on housing delivery within the Plan as a whole.
EqIA	0	--	--	-
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqIA protected characteristics.	Designating this site as Local Gap and therefore maintaining separation between settlements would mean delivery of housing on the site would be resisted further reducing the ability of the Plan to meet local housing need. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a negative impact on the EqIA protected characteristics 'age', 'disability' and 'race'.	Designating this site as Local Gap and therefore maintaining separation between settlements would resist development of the site further reducing the ability of the Plan to meet local housing need. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a negative impact on the EqIA protected characteristics 'age', 'disability' and 'race'.	Designating this part of site as Local Gap will reduce the amount of housing overall that can be provided on the wider development site. However this is unlikely to significantly impact on housing delivery within the Plan as a whole. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a negative impact on the EqIA protected characteristics 'age', 'disability' and 'race'.
12.Communities	+	+	+	+
	Designating this site as Local Gap will help preserve the separate identities of local communities either side of the gap and protect this area of open space.	Designating this site as Local Gap will help preserve the separate identities of local communities either side of the gap and protect this area of open space.	Designating this site as Local Gap and therefore maintaining separation between settlements will help maintain and retain the separate identities of local communities either side of the gap.	Designating this part of the site as Local Gap and therefore maintaining separation between settlements will help maintain and retain the separate identities of local communities either side of the gap.



<b>HIA</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>
	Designating this site as Local Gap will help preserve the separate identities of local communities either side of the gap and protect this area of open space which will provide health and well-being benefits to the local community.	Designating this site as Local Gap will help preserve the separate identities of local communities either side of the gap and protect this area of open space which will provide health and well-being benefits to the local community	Designating this site as Local Gap and therefore maintaining separation between settlements will help maintain and retain the separate identities of local communities either side of the gap and help ensure a sense of tranquillity which will support the health and well-being of the local community.	Designating this part of the site as Local Gap and therefore maintaining separation between settlements will help maintain and retain the separate identities of local communities either side of the gap and help ensure a sense of tranquillity which will support the health and well-being of the local community.
<b>EqlA</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>
	Designating this site as Local Gap will help preserve the separate identities of local communities either side of the gap and protect this area of open space which will provide health and well-being benefits to the local community. This will support the EqlA protected characteristics.	Designating this site as Local Gap will help preserve the separate identities of local communities either side of the gap and protect this area of open space which will provide health and well-being benefits to the local community. This will support the EqlA protected characteristics.	Designating this site as Local Gap and therefore maintaining separation between settlements will help maintain and retain the separate identities of local communities either side of the gap and help ensure a sense of tranquillity which will support the health and well-being of the local community. This will support the EqlA protected characteristics.	Designating this part of the site as Local Gap and therefore maintaining separation between settlements will help maintain and retain the separate identities of local communities either side of the gap and help ensure a sense of tranquillity which will support the health and well-being of the local community. This will support the EqlA protected characteristics.
13.Education	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on education.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on education.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on education.	Designating this part of the site as Local Gap would have no impact on education.
<b>EqlA</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqlA protected characteristics.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqlA protected characteristics.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqlA protected characteristics.	Designating this part of the site as Local Gap would have no impact upon the EqlA protected characteristics.
14.Economy	<b>-</b>	<b>-</b>	<b>-</b>	<b>?</b>
	Designating this site as Local Gap will protect this site which may have been capable of delivering some employment	Designating this site as Local Gap and therefore maintaining separation between settlements will protect this site which	Designating this site as Local Gap and therefore maintaining separation between settlements will protect this site which	Designating this part of the site as Local Gap will reduce the amount of development that can be delivered on the

	space. However, a large portion of this site contains Brooklands Lake and the site is already in leisure / open space use and not considered available.	may have been capable of delivering some employment space as part of a mixed use scheme.	may have been capable of delivering some employment space as part of a mixed use scheme.	site as a whole which may have included capacity for some employment uses.
<b>EqlA</b>	<b>0</b>	<b>-</b>	<b>-</b>	<b>/</b>
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact upon the EqlA protected characteristics.	Designating this site as Local Gap and therefore maintaining separation between settlements will protect this site which may have been capable of delivering some employment space as part of a mixed use scheme. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may have lower levels of skills attainment / qualifications and be on lower incomes. It is likely that there will be a negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'.	Designating this site as Local Gap and therefore maintaining separation between settlements will protect this site which may have been capable of delivering some employment space as part of a mixed use scheme. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may have lower levels of skills attainment / qualifications and be on lower incomes. It is likely that there will be a negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'.	Designating this part of the site as Local Gap and therefore maintaining separation between settlements will help maintain and retain the separate identities of local communities either side of the gap and help ensure a sense of tranquillity which will support the health and well-being of the local community. This will support the EqlA protected characteristics. However, the designation will reduce the amount of development that can be delivered on the site as a whole which may have included capacity for some employment uses. Therefore this could particularly impact on older and younger people, those with disabilities and ethnic minorities who may have lower levels of skills attainment / qualifications and be on lower incomes.
15.Town and Local Centres	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on the vitality and viability of the Town and Local Centres.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on the vitality and viability of the Town and Local Centres.	Designating this site as Local Gap and therefore maintaining separation between settlements would have no impact on the vitality and viability of the Town and Local Centres.	Designating this part of the site as Local Gap would have no impact on the vitality and viability of the Town and Local Centres.
16.Travel and Access	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as Local Gap and therefore maintaining separation between settlements would	Designating this site as Local Gap and therefore maintaining separation between settlements would	Designating this site as Local Gap and therefore maintaining separation between settlements would	Designating this part of the site as Local Gap would have no impact on access to and from sustainable

	have no impact on access to and from sustainable modes of transport.	have no impact on access to and from sustainable modes of transport.	have no impact on access to and from sustainable modes of transport.	modes of transport.
<b>Mitigation</b>	None identified	None identified	None identified	None identified
<b>Conclusions</b>	There are very positive effects associated with landscape & character and the built environment objective due the primary purpose of the Local Gap maintaining separation between settlements. There are also positive effects for communities and healthy lifestyles due to the area of open space being maintained as Gap. Negative effects are identified against the housing and economy objectives due to the potential loss of land for development however given that most of this site is currently in use as a park, the area that would be available is limited to the north western corner. Other objectives are rated as neutral recognising the indirect benefits in terms of protecting this area of open space.	This option has very positive effects when scored against landscape and character and historic environment reflecting the benefits of maintaining separation between settlements. There are also multiple other positive impacts associated with preserving the land in its current state. It should be noted that there are significant negative impacts associated with resisting development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated.	This option has very positive effects on landscape & character and built environment objectives through its primary purpose of maintaining separation between settlements and preventing coalescence. There are also other positive effects mostly through indirect impacts of preserving the land in its current undeveloped state. It should be noted that there are significant negative impacts associated with resisting development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated.	The scoring reflects the compact nature of this site and that it will ultimately form part of the wider gap alongside designations to the east in Adur. This option has multiple positive benefits reflecting its contribution to protecting the Gap as a whole and preventing coalescence. It scores negative due to the lack of housing that potentially could have been delivered here in addition to the allocation on the remainder of the site.
<b>Conclusions – HIA / EqlA</b>	There are positive effects for healthy lifestyles and communities due to the area of open space being maintained as Gap.	This option has very positive effects when scored against healthy lifestyles and communities reflecting the benefits of maintaining separation between settlements. There are also significant negative impacts associated with resisting development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated.	This option has very positive effects when scored against healthy lifestyles and communities reflecting the benefits of maintaining separation between settlements. There are also significant negative impacts associated with resisting development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated.	There is a positive effect for communities due to the area of open space being maintained as Gap. There is a neutral impact for healthy lifestyles as designating this part of the site as Local Gap will have no direct impact given the small size of the site.
<b>Recommendation</b>	All these options have an overall positive or neutral impact however it is recognised that Chatsmore Farm and Goring Ferring Gap score stronger due to the additional positive effects identified relating to the historic environment.			

	<b>SP6: Local Green Space Designation</b>		
	The sites designated were identified through community engagement and interest. The decision as to whether they are suitable and meet the criteria for Local Green Space designation has been informed by evidence.		
<b>Options</b>	<b>Goring Ferring Gap</b>	<b>Chatsmore Farm</b>	<b>Brooklands Recreation Area</b>
1. Environmental Quality	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as LGS would have no impact on environmental quality	Designating this site as LGS would have no impact on environmental quality	Designating this site as LGS would have no impact on environmental quality
2. Biodiversity	<b>++</b>	<b>+</b>	<b>++</b>
	Designating this site as a LGS would recognise its valued wildlife including its ornithological value and protect it from unsuitable development.	Designate this site as LGS would recognise its valued wildlife associated with the Ferring Rife and protect it from unsuitable development. However it is recognised that the Rife only covers a small part of the site and this has therefore been scored as a positive effect.	Designating this site as a LGS would recognise its valued wildlife in particular the wetland species supported by the lake, and protect it from inappropriate development.
3. Land and Soils	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as LGS would have no impact on land and soils	Designating this site as LGS would have no impact on land and soils	Designating this site as LGS would have no impact on land and soils
4. Energy	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as LGS would have no impact on energy use or climate change mitigation	Designating this site as LGS would have no impact on energy use or climate change mitigation	Designating this site as LGS would have no impact on energy use or climate change mitigation
5. Water Management	<b>?</b>	<b>+</b>	<b>+</b>
	Designating this site as LGS would have no direct impact on water management. However it may serve to restrict development in parts of the site which are at a high risk of flooding.	The Ferring Rife runs through this site and is cited by local communities as being valued for its wildlife. The Rife also conveys surface water flows from urban areas to the east and north out to sea. Therefore designating this site as LGS will help protect the Rife and ensure it continues to perform this function.	Brooklands lake is a focal part of this site and is particularly valued by the local community for a range of reasons. The lake itself is a balancing pond providing storage for surface water flows from East Worthing, Sompting and Lancing before they are discharged out to sea. Therefore designating this site as Local Green Space will protect this important drainage infrastructure from inappropriate development.
6. Landscape and Character	<b>++</b>	<b>++</b>	<b>+</b>
	Designating this site as LGS will help protect this valued open space and uninterrupted views from the South Downs National Park to the coastline.	Designating this site as LGS will help protect the valued views across this undeveloped site to the Downs helping to protect the setting of the National Park	Designating this site as LGS and protecting this open space that is located within the Gap will help preserve the Gap providing a sense of place to local communities
7. Built Environment	<b>/</b>	<b>/</b>	<b>/</b>
	Designating this site as LGS will have no direct impact on	Designating this site as LGS will have no direct impact on	Designating this site as LGS will have no direct impact on

	the built environment	the built environment	the built environment
8. Historic Environment	++	+	0
	Designating this site as LGS will protect this site which is valued by the local community for its historic associations as part of the Goring Hall Estate (Grade II Listed)	Designating this site as LGS will continue to protect the historic setting of Highdown Hill which contains a Scheduled Ancient Monument.	Designating this site as LGS will have no impact on the historic environment
9. Healthy Lifestyles	++	+	++
	Designating this site as LGS protects this site which is valued by the local community for quiet recreation and tranquillity. The site contains bridleways, footpaths and recreation grounds. It is popular with bird watchers and astronomical groups.	Designating this site as LGS protects this site which is valued by the local community for health and wellbeing. There are footpaths along the western and northern boundaries as well as an informal walking route along the Rife.	Designating this site as LGS will protect this site which is valued by the local community for recreation. The site contains a number of leisure and recreation facilities and was rated in the Worthing Open Space Study (2014) as providing one of the highest quality areas of natural / semi-natural open space. The site also contains children play facilities including some that are wheelchair accessible.
HIA	++	+	++
	Designating this site as LGS protects this site which is valued by the local community for quiet recreation and tranquillity which helps to support healthy lifestyles. The site contains bridleways, footpaths and recreation grounds. It is popular with bird watchers and astronomical groups.	Designating this site as LGS protects this site which is valued by the local community for health and wellbeing. There are footpaths along the western and northern boundaries as well as an informal walking route along the Rife.	Designating this site as LGS will protect this site which is valued by the local community for recreation which helps to support healthy lifestyles. The site contains a number of leisure and recreation facilities and was rated in the Worthing Open Space Study (2014) as providing one of the highest quality areas of natural / semi-natural open space. The site also contains children play facilities including some that are wheelchair accessible.
EqlA	++	+	++
	Designating this site as LGS protects this site which is valued by the local community for quiet recreation and tranquillity which helps to support healthy lifestyles. The site contains bridleways, footpaths and recreation grounds. It is popular with bird watchers and astronomical groups. This will support the EqlA protected characteristics.	Designating this site as LGS protects this site which is valued by the local community for health and wellbeing. There are footpaths along the western and northern boundaries as well as an informal walking route along the Rife. This will support the EqlA protected characteristics.	Designating this site as LGS will protect this site which is valued by the local community for recreation which helps to support healthy lifestyles. The site contains a number of leisure and recreation facilities and was rated in the Worthing Open Space Study (2014) as providing one of the highest quality areas of natural / semi-natural open space. The site also contains children play facilities including some that are wheelchair accessible. This will support

			the EqIA protected characteristics, in particular, 'age' and 'disability'.
10.Crime and Public Safety	0	0	0
	There is no link between designating this site as LGS and crime and public safety	There is no link between designating this site as LGS and crime and public safety	There is no link between designating this site as LGS and crime and public safety
HIA	0	0	0
	There is no link between designating this site as LGS and crime and public safety	There is no link between designating this site as LGS and crime and public safety	There is no link between designating this site as LGS and crime and public safety
EqIA	0	0	0
	There is no link between designating this site as LGS and upon the EqIA protected characteristics.	There is no link between designating this site as LGS and upon the EqIA protected characteristics.	There is no link between designating this site as LGS and upon the EqIA protected characteristics.
11.Housing	--	--	-
	Designating this site as LGS will afford the site protection consistent with Green Belt status. This will prevent the delivery of housing required to meet local need.	Designating this site as LGS will afford the site protection consistent with Green Belt status. This will prevent the delivery of housing required to meet local need.	Designating this site as LGS will afford the site protection akin to Green Belt status. This will prevent the delivery of housing required to meet local need. However given the current use of the majority of the site as a park it is unlikely that the site would become available for development
EqIA	--	--	0
	Designating this site as LGS will afford the site protection consistent with Green Belt status. This will prevent the delivery of housing required to meet local need. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a negative impact on the EqIA protected characteristics 'age', 'disability' and 'race'.	Designating this site as LGS will afford the site protection consistent with Green Belt status. This will prevent the delivery of housing required to meet local need. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a negative impact on the EqIA protected characteristics 'age', 'disability' and 'race'.	Designating this site as LGS would have no impact upon the EqIA protected characteristics.
12.Communities	++	++	++
	Designating this site as LGS will protect this site that is highly valued by the local community.	Designating this site as LGS will protect this site that is highly valued by the local community.	Designating this site as LGS will protect this site that is highly valued by the local community.
HIA	++	++	++
	Designating this site as LGS will protect this site that is highly valued by the local community for its health and well-being benefits.	Designating this site as LGS will protect this site that is highly valued by the local community for its health and well-being benefits.	Designating this site as LGS will protect this site that is highly valued by the local community for its health and well-being benefits.

<b>EqlA</b>	<b>++</b>	<b>++</b>	<b>++</b>
	Designating this site as LGS will protect this site that is highly valued by the local community for its health and well-being benefits. This will support the EqlA protected characteristics.	Designating this site as LGS will protect this site that is highly valued by the local community for its health and well-being benefits. This will support the EqlA protected characteristics.	Designating this site as LGS will protect this site that is highly valued by the local community for its health and well-being benefits. This will support the EqlA protected characteristics.
13.Education	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as LGS would have no impact on education.	Designating this site as LGS would have no impact on education.	Designating this site as LGS would have no impact on education.
<b>EqlA</b>	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as LGS would have no impact upon the EqlA protected characteristics.	Designating this site as LGS would have no impact upon the EqlA protected characteristics.	Designating this site as LGS would have no impact upon the EqlA protected characteristics.
14.Economy	<b>-</b>	<b>-</b>	<b>-</b>
	Designating this site as LGS will protect this site which may have been capable of delivering some employment space as part of a mixed use scheme.	Designating this site as LGS will protect this site which may have been capable of delivering some employment space as part of a mixed use scheme.	Designating this site as LGS will protect this site which may have been capable of delivering some employment space as part of a mixed use scheme. However given the current use of the majority of the site as a park it is unlikely that the site would become available for development
<b>EqlA</b>	<b>-</b>	<b>-</b>	<b>0</b>
	Designating this site as LGS will protect this site which may have been capable of delivering some employment space as part of a mixed use scheme. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may have lower levels of skills attainment / qualifications and be on lower incomes. It is likely that there will be a negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'.	Designating this site as LGS will protect this site which may have been capable of delivering some employment space as part of a mixed use scheme. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may have lower levels of skills attainment / qualifications and be on lower incomes. It is likely that there will be a negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'.	Designating this site as LGS would have no impact upon the EqlA protected characteristics.
15.Town and Local Centres	<b>0</b>	<b>0</b>	<b>0</b>
	Designating this site as LGS would have no impact on the town or other centres	Designating this site as LGS would have no impact on the town or other centres	Designating this site as LGS would have no impact on the town or other centres
16.Travel and Access	<b>/</b>	<b>/</b>	<b>0</b>
	Designating this site as LGS would have no impact on access to and from sustainable modes of transport but will protect existing bridleways, footpaths and walking routes that are	Designating this site as LGS would have no impact on access to and from sustainable modes of transport but will protect existing footpaths and walking routes that are valued by the	Designating this site as LGS would have no impact on access to and from sustainable modes of transport



	valued by the community.	community.	
<b>Mitigation</b>	None identified	None identified	None identified
<b>Conclusions</b>	This option has very positive effects in terms of biodiversity, historic environment, landscape & character, healthy lifestyles and communities reflecting the reasons the site is valued. This is balanced against a very negative effect for housing and a negative effect for economy reflecting the level of protection given by the designation which will restrict most development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.	This option scores less positively than the other two but still has very positive effects in landscape & character and communities reflecting the reasons the site is valued. In addition there are a number of positive effects which reflect the aspects the community values. This is balanced against a very negative effect for housing and a negative effect for economy reflecting the level of protection given by the designation which will restrict most development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.	This option has very positive effects in terms of biodiversity, healthy lifestyles and communities it also has a positive effect for landscape & character reflecting the reasons the site is valued by the local community. This is balanced against negative effects for housing and economy reflecting the level of protection given by the designation which will restrict most development but acknowledging that as most of the site is in use as formal recreation it is unlikely to become available for development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.
<b>Conclusions – HIA / EqIA</b>	This option has very positive effects in terms of healthy lifestyles and communities reflecting the reasons the site is valued. This is balanced against a very negative effect for housing and a negative effect for economy reflecting the level of protection given by the designation which will restrict most development.	This option has positive effects in terms of healthy lifestyles and a very positive effect for communities which reflect the aspects the community values. This is balanced against a very negative effect for housing and a negative effect for economy reflecting the level of protection given by the designation which will restrict most development.	This option has very positive effects in terms of healthy lifestyles and communities reflecting the reasons the site is valued by the local community. This is balanced against negative effects for housing and economy reflecting the level of protection given by the designation which will restrict most development but acknowledging that as most of the site is in use as formal recreation it is unlikely to become available for development.
<b>Recommendation</b>	All these sites score positively overall and should be designated as LGS in the Local Plan.		

	<b>PA1: Goring - Ferring Gap</b>	
<b>Options</b>	<b>Option 1: Protecting the site</b>	<b>Option 2: Allocating the site for development.</b>
1. Environmental Quality	/	/
	The site is currently undeveloped; by protecting this site there would be no additional benefits in terms of environmental quality.	Allocating this site may result in an indirect increase in air pollution as a result of the traffic generated by development. However there are no direct impacts associated with environmental quality or pollution as a result of development on this site.
2. Biodiversity	/	-
	The site is currently undeveloped and used for agriculture. By protecting it any habitats onsite would also be protected from development. However protecting it in itself	Allocating this site for development would result in a loss of habitats that currently support significant numbers of wintering birds. There are also pockets of woodland



	wouldn't bring any ecological enhancements or improvements.	within and surrounding the site. Development should seek to protect and enhance the most valuable habitats.
3. Land and Soils	+	-
	Protecting this site would safeguard one of the last parcels of land in Worthing that is considered to be the Best and Most Versatile Agricultural Land.	Allocating this site for development will result in the loss of one of the few remaining parcels of Grade 2 Agricultural Land in the local area,
4. Energy	0	0
	Protecting this site would have no impact on energy or climate change mitigation.	Protecting this site would have no impact on energy or climate change mitigation.
5. Water Management	+	-
	Protecting this site would have no effect on water management however it would allow avoid development in part of the site which is at a high risk of flooding.	Allocating this site for development would result in development in areas at a risk of flooding from a variety of sources. Parts of the site in Flood Zone 3 should be kept free from development.
6. Landscape and Character	++	--
	Protecting this site would maintain the visual link free from development between the undeveloped coastline and National Park. It would also continue in providing effective physical and visual separation between Goring and Ferring and part of the visual setting to the National Park. It would also protect the undeveloped character of the coastline in this location which the site is considered to make a substantial contribution to.	Allocating this site for development would significantly impact on the setting of the National Park, the undeveloped character of the coastline in this location and result in coalescence between Goring and Ferring.
7. Built Environment	0	0
	Protecting this site would have no impact on the built environment in terms of encouraging good quality design.	Allocating the site in itself would have no impact on the delivery of good quality design.
8. Historic Environment	+	-
	This site forms part of the setting to Goring Hall (Grade II Listed) which is located to the north of the site and was originally within the Goring Hall Estate. Protecting this site will preserve the setting to Goring Hall and its historic relationship with the coastline.	Allocating this site for development will permanently change the open landscape that originally formed the southern part of the Goring Hall Estate and the relationship of Goring Hall with the undeveloped coastline.
9. Healthy Lifestyles	/	-
	The site contains bridleways, footpaths and recreation grounds. Protecting the site will ensure these remain unchanged.	Development may result in the loss of some of these features and the health benefits gained from walking and enjoying this 'open' environment. Any development should ensure that the bridleways, footpaths and recreation grounds are incorporated and kept free from development.
HIA	/	-
	The site contains bridleways, footpaths and recreation grounds. Protecting the site will ensure these remain unchanged.	Development may result in the loss of some of these features and the health benefits gained from walking and enjoying this 'open' environment. Any development should ensure that the bridleways, footpaths and recreation grounds are incorporated and kept free from development.

<b>EqlA</b>	/	-
	The site contains bridleways, footpaths and recreation grounds. Protecting the site will ensure these remain unchanged.	Development may result in the loss of some of these features and the health benefits gained from walking and enjoying this 'open' environment and may impact on the EqlA characteristics such as 'age' and 'disability'. Any development should ensure that the bridleways, footpaths and recreation grounds are incorporated and kept free from development.
10.Crime and Public Safety	0	0
	Protecting the site would have no impact on crime and public safety.	Allocating this site would have no impact on crime and public safety
<b>HIA</b>	0	0
	Protecting the site would have no impact on crime and public safety.	Allocating this site would have no impact on crime and public safety
<b>EqlA</b>	0	0
	Protecting the site would have no impact upon the EqlA protected characteristics.	Allocating this site would have no impact upon the EqlA protected characteristics.
11.Housing	--	++
	Protecting the site would prevent the delivery of housing on one of the largest available sites in Worthing, an area that is unable to meet its local housing need.	Allocating this site for housing would provide a significant source of new housing for the area contributing to meeting local housing need.
<b>EqlA</b>	--	++
	Protecting the site would prevent the delivery of housing on one of the largest available sites in Worthing, an area that is unable to meet its local housing need. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'.	Allocating this site for housing would provide a significant source of new housing for the area contributing to meeting local housing need and therefore supporting EqlA protected characteristics 'age', 'disability' and 'race'.
12.Communities	+	-
	Protecting the site would safeguard an asset that is well valued by the local community. This is supported by the application made by the local community to consider the site as a Local Green Space.	Allocating the site for development would result in the loss of green space valued by the community. This is demonstrated through their application to designate the site as Local Green Space.
<b>HIA</b>	+	-
	Protecting the site would safeguard an asset that is well valued by the local community with regards to supporting their health and well-being. This is supported by the application made by the local community to consider the site as a Local Green Space.	Allocating the site for development would result in the loss of green space valued by the community and subsequently would have a negative effect on their health and well-being. This is demonstrated through their application to designate the site as Local Green Space.
<b>EqlA</b>	+	-
	Protecting the site would safeguard an asset that is well valued by the local community with regards to supporting their health and well-being. This is supported by the application made by the local community to	Allocating the site for development would result in the loss of green space valued by the community and subsequently would have a negative effect on their health and well-being. This is demonstrated through their

	consider the site as a Local Green Space. This would support the EqlA protected characteristics.	application to designate the site as Local Green Space. It is considered that the EqlA protected characteristics 'age' and 'disability' could be negatively affected.
13.Education	<b>0</b>	<b>?</b>
	Protecting the site would have no impact on provision of or accessibility to education facilities.	Allocating the site for development may place pressure on existing education facilities. However the site itself may also present an opportunity to deliver new or additional facilities.
<b>EqlA</b>	<b>0</b>	<b>0</b>
	Protecting the site would have no impact upon the EqlA protected characteristics.	Protecting the site would have no impact upon the EqlA protected characteristics.
14.Economy	<b>/</b>	<b>?</b>
	Protecting the site would be unlikely to have any impact on local economic growth.	Allocating the site for housing is unlikely to directly impact local economic growth, however additional housing will support and increased workforce who may seek work locally.
<b>EqlA</b>	<b>/</b>	<b>?</b>
	Protecting the site would be unlikely to have any impact on local economic growth and therefore unlikely to impact on the EqlA protected characteristics.	Allocating the site for housing is unlikely to directly impact local economic growth, however additional housing will support and increased workforce who may seek work locally and therefore support those people who are unemployed or on low incomes. This may support EqlA protected characteristics 'age', 'disability' and 'race'.
15.Town and Local Centres	<b>0</b>	<b>0</b>
	There is no link between protecting the site and the vitality and viability of town and local centres.	Allocating this site for housing is unlikely to impact on the vitality and viability of town and local centres.
16.Travel and Access	<b>0</b>	<b>?</b>
	There is no link between protecting the site and improving access to and from sustainable modes of transport.	Allocating the site for development would have no direct impact on access to sustainable modes of transport but the increased population may attract additional bus services
<b>Mitigation</b>	There is a very negative effect associated with the loss of housing delivery. It is not considered that this can be mitigated.	Development should seek to protect and enhance the most valuable habitats. Parts of the site in Flood Zone 3 should be kept free from development. Any development should ensure that the bridleways, footpaths and recreation grounds are incorporated and kept free from development.
<b>Conclusions</b>	This option scores as having very positive effects in terms of landscape and character 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 with some neutral scores reflecting how with this option some aspects of the site will remain unchanged.	This option scores as having very positive effects for housing which has to be balanced against very negative effects on landscape and character. This option also scores negatively against a number of other environmental and social objectives although some mitigation has been identified. There are also several uncertain scores relating to possible additional or indirect benefits of development.
<b>Conclusions – HIA / EqlA</b>	There is a positive effect for communities as protecting the site would safeguard an asset that is well valued by the local community.	This option scores as having very positive effects for housing which has to be balanced against negative effects on healthy lifestyles

	This option scores as having neutral effect on healthy lifestyles and economy. The site scores very negative effect for housing	and communities. There are also several uncertain scores relating to possible additional or indirect benefits of development.
<b>Recommendation</b>	The option to protect the site from inappropriate development is considered to be the most sustainable scoring positively overall. This is despite a very negative effect associated with the loss of housing delivery, which it is not considered possible to mitigate.	

	<b>PA2: Chatsmore Farm</b>	
<b>Options</b>	<b>Option 1: Protecting the site.</b>	<b>Option 2: Allocating the whole site for development.</b>
	<b>/</b>	<b>-</b>
1. Environmental Quality	The site is currently undeveloped; by protecting this site there would be no additional benefits in terms of environmental quality.	Allocating this site will likely result in increased levels of traffic and congestion which would negatively impact air quality. In addition without mitigation new development adjacent to the Ferring Rife may result in urban run-off deteriorating water quality and people being located adjacent to noise sources (A259 and railway line). However it is also acknowledged that the Rife already conveys drainage from urban areas to the east.
	<b>/</b>	<b>-</b>
2. Biodiversity	The site is currently undeveloped and used for agriculture. By protecting it any habitats onsite would also be protected from development. However protecting it in itself wouldn't bring any ecological enhancements or improvements.	Allocating this site for development will result in a loss of much of the natural habitat contained on the site. As part of any development valuable habitats should be protected and retained.
	<b>+</b>	<b>-</b>
3. Land and Soils	Protecting this site would safeguard one of the last parcels of land in Worthing that is considered to be the Best and Most Versatile Agricultural Land.	Allocating this site for development will result in the loss of one of the few remaining parcels of Grade 1 Agricultural Land in the local area,
	<b>0</b>	<b>0</b>
4. Energy	Protecting this site would have no impact on energy or climate change mitigation.	Allocating this site would have no impact on energy or climate change mitigation
	<b>+</b>	<b>-</b>
5. Water Management	Protecting this site would have no effect on water management however it would allow the floodplain associated with the Ferring Rife continue to operate in its natural state and avoid development in part of the site which is at a high risk of flooding.	Allocating this site for development would result in development in areas at a risk of flooding from a variety of sources. Parts of the site in Flood Zone 3 should be kept free from development.
	<b>++</b>	<b>--</b>
6. Landscape and Character	Protecting this site would safeguard one of the last remaining gaps from development along this part of the south coast preventing coalescence. It would also protect the undeveloped setting to the South Downs National Park.	Allocating this site for development will result in the loss of a site forming part of the undeveloped setting to the National Park and coalescence between Arun and Worthing in the last remaining gap along the A259.
	<b>0</b>	<b>0</b>
7. Built Environment	Protecting this site would have no impact on the built environment in terms of encouraging good quality design.	Allocating the site in itself would have no impact on the delivery of good quality design.

8. Historic Environment	/	?
	Protecting this site would have neither a positive or negative effect on nearby heritage assets	Whilst located close to the site, allocating this site is unlikely to impact on The Highdown Conservation Area and Highdown Gardens. Any development should consider and assess the impact of any development on these heritage assets including their setting.
9. Healthy Lifestyles	/	-
	There are public rights of way throughout the site as well as informal walking routes. Protecting the site would ensure these remain unchanged	Development may result in the loss of some of these features and the health benefits gained from walking in this 'open' environment. Any development should ensure that public rights of way and walking routes are incorporated.
HIA	/	-
	The site contains bridleways, footpaths and recreation grounds. Protecting the site will ensure these remain unchanged.	Development may result in the loss of some of these features and the health benefits gained from walking and enjoying this 'open' environment. Any development should ensure that the bridleways, footpaths and recreation grounds are incorporated and kept free from development.
EqIA	/	-
	The site contains bridleways, footpaths and recreation grounds. Protecting the site will ensure these remain unchanged.	Development may result in the loss of some of these features and the health benefits gained from walking and enjoying this 'open' environment and may impact on the EqIA characteristics such as 'age' and 'disability'. Any development should ensure that the bridleways, footpaths and recreation grounds are incorporated and kept free from development.
10. Crime and Public Safety	0	0
	Protecting the site would have no impact on crime and public safety.	Allocating this site would have no impact on crime and public safety.
HIA	0	0
	Protecting the site would have no impact on crime and public safety.	Allocating this site would have no impact on crime and public safety.
EqIA	0	0
	Protecting the site would have no impact upon the EqIA protected characteristics.	Allocating this site would have no impact on upon the EqIA protected characteristics.
11. Housing	--	++
	Protecting the site would prevent the delivery of housing on one of the largest available sites in Worthing, an area that is unable to meet its local housing need.	Allocating this site for housing would provide a significant source of new housing for the area contributing to meeting local housing need.
EqIA	--	++
	Protecting the site would prevent the delivery of housing on one of the largest available sites in Worthing, an area that is unable to meet its local housing need. This may impact particularly on older and younger people, those with disabilities and ethnic minorities who may be on lower incomes or unable to meet their housing needs through market housing. It is likely that there will be a	Allocating this site for housing would provide a significant source of new housing for the area contributing to meeting local housing need and therefore supporting EqIA protected characteristics 'age', 'disability' and 'race'.

	negative impact on the EqlA protected characteristics 'age', 'disability' and 'race'.	
12. Communities	+	-
	Protecting the site would safeguard an asset that is well valued by the local community. This is supported by the application made by the local community to consider the site as a Local Green Space	Allocating the site for development would result in the loss of green space valued by the community. This is demonstrated through their application to designate the site as Local Green Space.
HIA	+	-
	Protecting the site would safeguard an asset that is well valued by the local community with regards to supporting their health and well-being. This is supported by the application made by the local community to consider the site as a Local Green Space.	Allocating the site for development would result in the loss of green space valued by the community and subsequently would have a negative effect on their health and well-being. This is demonstrated through their application to designate the site as Local Green Space.
EqlA	+	-
	Protecting the site would safeguard an asset that is well valued by the local community with regards to supporting their health and well-being. This is supported by the application made by the local community to consider the site as a Local Green Space. This would support the EqlA protected characteristics.	Allocating the site for development would result in the loss of green space valued by the community and subsequently would have a negative effect on their health and well-being. This is demonstrated through their application to designate the site as Local Green Space. It is considered that the EqlA protected characteristics 'age' and 'disability' could be negatively affected.
13. Education	0	?
	Protecting the site would have no impact on provision of or accessibility to education facilities.	Allocating the site for development may place pressure on existing education facilities. However the site itself may also present an opportunity to deliver new or additional facilities.
EqlA	0	0
	Protecting the site would have no impact upon the EqlA protected characteristics.	Protecting the site would have no impact upon the EqlA protected characteristics.
14. Economy	/	?
	Protecting the site would be unlikely to have any impact on local economic growth.	Allocating the site for housing is unlikely to directly impact local economic growth, however additional housing will support and increased workforce who may seek work locally.
EqlA	/	?
	Protecting the site would be unlikely to have any impact on local economic growth and therefore unlikely to impact on the EqlA protected characteristics.	Allocating the site for housing is unlikely to directly impact local economic growth, however additional housing will support and increased workforce who may seek work locally and therefore support those people who are unemployed or on low incomes. This may support EqlA protected characteristics 'age', 'disability' and 'race'.
15. Town and Local Centres	0	0
	There is no link between protecting the site and the vitality and viability of town and local centres.	Allocating this site for housing is unlikely to impact on the vitality and viability of town and local centres.
16. Travel and	0	+

Access	There is no link between protecting the site and improving access to and from sustainable modes of transport. Although it is recognised that the site is in a highly sustainable location, adjacent to Goring train station.	Allocating the site for housing would enable new homes to be delivered in a highly sustainable location adjacent to Goring train station. However it will not improve access to sustainable transport for existing communities.
Mitigation	There is a very negative effect associated with the loss of housing delivery. It is not considered that this can be mitigated.	As part of any development valuable habitats should be protected and retained. Parts of the site in Flood Zone 3 should be kept free from development. Any development should consider and assess the impact of any development on these heritage assets including their setting. Any development should ensure that public rights of way and walking routes are maintained.
Conclusions	There are very positive effects associated in terms of landscape and character reflecting the sensitive nature of this site. There are also a range of other positive effects in terms of local communities, water management and soils. There are a number of neutral effects 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.	Very negative effects have been identified on landscape and character 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 environmental effects which would require mitigation as part of any policy wording. However this option does score positively due to its ability to contribute to meeting local housing need and recognising the benefits of delivering housing in a highly sustainable location.
Conclusions – HIA / EqIA	There are neutral effects on healthy lifestyles and economy recognising that by protecting the site it will essentially remain unchanged from the baseline situation. There is a positive effect on communities. There is 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.	There are negative effects on healthy lifestyles and communities. However this option does score positively due to its ability to contribute to meeting local housing need and recognising the benefits of delivering housing in a highly sustainable location.
Recommendation	The option to protect the site from inappropriate development is considered to be the most sustainable scoring positively overall. This is despite a very negative effect associated with the loss of housing delivery, which it is not considered possible to mitigate.	

	PA3: Brooklands Recreation Area	
Options	Option 1: Retaining the north west portion of the site (known as Dale Road) and protecting the site	Option 2: Allocating the north west portion of the site (known as Dale Road) for development.
1. Environmental Quality	/	?
	Continuing to protect the site would have neither a positive or negative impact on environmental quality. Brooklands lake has historically suffered with high levels of pollution. However recent improvements (separate from the Local Plan process) have recently undertaken. It is not considered that the decision to protect this site through the Local Plan will have any direct impact on the quality of the site including Brooklands Lake, however it may provide certainty on the future of the Park which could support further initiatives to improve and enhance the Park.	Allocating the north west portion of the site has the potential to impact on the Teville Stream (a WFD waterbody) which flows along the sites western boundary. However at this stage it is not possible to determine whether this would be negative or if development would present opportunities to deliver improvements and enhancements.



2. Biodiversity	/	-
	Continuing to protect the site would mean the habitats onsite particularly those associated with the Lake would also continue to be protected from inappropriate development. However protecting the site in itself wouldn't deliver any ecological enhancements or gains.	Allocating the north west portion of the site would result in the potential loss of habitats. The site contains drainage channels along the northern and western site boundaries which are considered to form part of a wider network of wetland habitats, and scrub dominates the rest of the site. Development should seek opportunities to enhance these habitats.
3. Land and Soils	-	+
	The site is located on a former landfill, protecting this site may mean opportunities to remediate the land likely to come forward through development may be lost.	The site is located on a former landfill, allocating the site could present opportunities through development to remediate the site improving the quality of soils and relevant controlled waters. However, the levels of contamination and varying site levels may also present a constraint to development.
4. Energy	0	0
	Protecting this site would have no impact on energy or climate change mitigation.	Protecting this site would have no impact on energy or climate change mitigation.
5. Water Management	+	-
	Brooklands Lake serves as a balancing pond storing the majority of surface water drainage from East Worthing prior to being discharged to sea. Protecting this site will ensure this important function continues. Protecting the site will also direct development away from areas at high probability of flooding.	There are small areas of flood risk along the sites northern, eastern and western boundaries. Any development should ensure site layout avoids development on these parts of the site,
6. Landscape and Character	++	--
	Protecting this site will secure retention of the gap between Worthing and Lancing along the lower coastal plain and prevent coalescence along the coastline between the two settlements.	Allocating this part of the site for development will result on the loss of the only separation between east Worthing and Lancing at one of the narrowest points of the gap between the two settlements
7. Built Environment	0	0
	Protecting the site would have no impact on the delivery of good quality design.	Allocating the site in itself would have no impact on the delivery of good quality design.
8. Historic Environment	0	0
	Protecting this site would have no impact on the historic environment.	Allocating this site would have no impact on the historic environment.
9. Healthy Lifestyles	+	/
	Protecting this site will continue to support healthy lifestyles through the recreational uses currently associated with the Park. It will also enable expansion of the Park into the area of land to the north west providing additional benefits.	This part of the site is currently not publically accessible therefore there will be no impact on healthy lifestyles as a result of developing this part of the site.
HIA	+	/
	Protecting this site will continue to support healthy lifestyles through the recreational uses currently associated with the Park. It will also enable expansion of the Park into the area of land to the north west providing additional benefits.	This part of the site is currently not publically accessible therefore there will be no impact on healthy lifestyles as a result of developing this part of the site.



<b>EqlA</b>	<b>+</b>	<b>0</b>
	Protecting this site will continue to support healthy lifestyles through the recreational uses currently associated with the Park. This will support the EqlA protected characteristics.	Allocating this site would have no impact upon the EqlA protected characteristics.
10.Crime and Public Safety	<b>0</b>	<b>0</b>
	Protecting the site would have no impact on crime and public safety.	Allocating this site would have no impact on crime and public safety.
<b>HIA</b>	<b>0</b>	<b>0</b>
	Protecting the site would have no impact on crime and public safety.	Allocating this site would have no impact on crime and public safety.
<b>EqlA</b>	<b>0</b>	<b>0</b>
	Protecting this site would have no impact upon the EqlA protected characteristics.	Allocating this site would have no impact upon the EqlA protected characteristics.
11.Housing	<b>0</b>	<b>+</b>
	Protecting this site would have no impact on the delivery of housing as the site is currently in use as a park and recreation area.	Allocating this site would potentially provide new housing, however the levels of contaminated land mean a commercial/industrial use may be more suitable.
<b>EqlA</b>	<b>0</b>	<b>+</b>
	Protecting this site would have no impact on the delivery of housing as the site is currently in use as a park and recreation area and therefore would have no impact upon the EqlA protected characteristics.	Allocating this site would potentially provide new housing, however the levels of contaminated land mean a commercial/industrial use may be more suitable. The potential provision of housing / employment will support the EqlA protected characteristics.
12.Communities	<b>++</b>	<b>-</b>
	Protecting the site provides a valuable open space resource for the local community and the opportunity for it to be further expanded.	Allocating this part of the site would have no direct impact on the local community as the site is not currently publically accessible. However developing this site would remove the opportunity to expand the Park into this space.
<b>HIA</b>	<b>++</b>	<b>/</b>
	Protecting the site provides a valuable open space resource for the local community and thus continues to support healthy lifestyles through the recreational uses currently associated with the Park and the opportunity for it to be further expanded.	Allocating this part of the site would have no direct impact on the local community and their health and well-being as the site is not currently publically accessible. However developing this site would remove the opportunity to expand the Park into this space.
<b>EqlA</b>	<b>++</b>	<b>0</b>
	Protecting the site provides a valuable open space resource for the local community and thus continues to support healthy lifestyles through the recreational uses currently associated with the Park. This supports the EqlA protected characteristics.	Allocating this part of the site would have no impact upon the EqlA protected characteristics.
13.Education	<b>0</b>	<b>0</b>
	Protecting this site would have no impact on education.	Allocating this site would have no impact on education.
<b>EqlA</b>	<b>0</b>	<b>0</b>

	Protecting this site would have no impact on education and upon the EqIA protected characteristics.	Allocating this site would have no impact on education and upon the EqIA protected characteristics.
14.Economy	/	+
	Protecting the site is unlikely to have a significant impact on the local economy.	Allocating this part of the site may enable the delivery of employment floorspace supporting local economic growth.
EqIA	0	+
	Protecting this site would have no impact on education and upon the EqIA protected characteristics.	Allocating this part of the site may enable the delivery of employment floorspace supporting local economic growth. The potential provision of employment will support the EqIA protected characteristics.
15.Town and Local Centres	0	0
	There is no link between protecting the site and the vitality and viability of town and local centres.	There is no link between allocating this part of the site and the vitality and viability of town and local centres.
16.Travel and Access	0	0
	Protecting this site will have no impact on access to sustainable modes of transport.	Allocating this site will have no impact on access to sustainable modes of transport.
Mitigation	Opportunities should be promoted to expand the Park and recreation area into the north west portion of the site currently inaccessible to maximise benefits to the local community.	The negative impacts associated with development should be minimised by seeking opportunities to enhance valuable habitats on site and avoiding parts of the site at a high risk of flooding.
Conclusions	This option scores very positively for communities and landscape & character. There are also positive benefits when scored against healthy lifestyles and water management. 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.	This option to allocate the part of the site known as Dale Road scored positively for economy, housing and land and soils 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 reflecting the potential impact of development and communities as a result of the lost opportunity to expand the Brooklands Park into this area.
Conclusions – HIA / EqIA	This option scores very positively for communities. There are also positive benefits when scored against healthy lifestyles.	This option to allocate the part of the site known as Dale Road scored positively for economy and housing. Neutral effects were scored for healthy lifestyles and communities.
Recommendation	The option to protect the site is the most sustainable option overall. The option to protect the site excluding the north western corner (known as Dale Road) was not tested however the appraisal of allocating that part of the site shows it has very negative effects associated with the sensitivity of the site in terms of landscape and character.	

	<b>CP1 Housing Mix and Quality</b>		
	The Housing Implementation Strategy sets out the evidence to demonstrate that Worthing has a high proportion of older residents and those with mobility restrictions. Government policy is currently to help people to live in their own homes for as long as possible.		
Options	<b>Option 1: Require developments to meet the optional higher Building Regulations standard M4(2) for Accessible and Adaptable</b>	<b>Option 2: Expect Applications to comply with the optional higher standard M4(2) only.</b>	<b>Option 3: Continue to rely on current Building Regulations standards.</b>

	<b> dwellings where feasible and viable and for 10% of homes on major developments to meet Building Regulations requirement M4(3) wheelchair user dwellings.</b>		
1. Environmental Quality	<b>0</b>	<b>0</b>	<b>0</b>
	This would have no impact on environmental quality.	This would have no impact on environmental quality.	This would have no impact on environmental quality.
2. Biodiversity	<b>0</b>	<b>0</b>	<b>0</b>
	This would have no impact on biodiversity.	This would have no impact on biodiversity.	This would have no impact on biodiversity.
3. Land and Soils	<b>0</b>	<b>0</b>	<b>0</b>
	This would have no impact on land and soils.	This would have no impact on land and soils.	This would have no impact on land and soils.
4. Energy	<b>?</b>	<b>?</b>	<b>0</b>
	The installation of lifts to provide step free access could increase energy use but this is likely to be minimal overall.	The installation of lifts to provide step free access could increase energy use but this is likely to be minimal overall.	This would have no impact on energy.
5. Water Management	<b>?</b>	<b>?</b>	<b>0</b>
	Raising finished floor levels to provide flood risk mitigation may conflict with the need to provide step free access.	Raising finished floor levels to provide flood risk mitigation may conflict with the need to provide step free access.	This would have no impact on water management.
6. Landscape and Character	<b>0</b>	<b>0</b>	<b>0</b>
	This would have no impact on landscape and character.	This would have no impact on landscape and character.	This would have no impact on landscape and character.
7. Built Environment	<b>?</b>	<b>?</b>	<b>0</b>
	The need to provide step free access and lifts could increase the costs in providing dwellings above shops and other uses. In addition the need to provide wheelchair access to communal areas including parking could impact the layout of developments.	The need to provide step free access and lifts could increase the costs in providing dwellings above shops and other uses.	This would have no impact on the built environment.
8. Historic Environment	<b>0</b>	<b>0</b>	<b>0</b>
	This would have no impact on the historic environment. Given the requirement is only for a percentage of homes to be wheelchair user dwellings these are unlikely to impact heritage assets such as listed buildings.	This would have no impact on the historic environment.	This would have no impact on the historic environment.
9. Healthy Lifestyles	<b>++</b>	<b>+</b>	<b>-</b>
	This will allow people to adapt their dwellings to suit their needs meaning homes are suitable for more groups and enabling people to stay in their homes for longer reducing	This will allow people to adapt their dwellings to suit their needs meaning homes are suitable for more groups and enabling people to stay in their homes for longer reducing	This may result in people particularly the elderly needing to find alternative accommodation due to mobility issues.

	pressure on specialist housing. This would also improve the quality of housing available to wheelchair users which is likely to benefit their health.	pressure on specialist housing.	
HIA	++	+	-
	This will allow people to adapt their dwellings to suit their needs meaning homes are suitable for more groups and enabling people to stay in their homes for longer reducing pressure on specialist housing. This would also improve the quality of housing available to wheelchair users which is likely to benefit their health.	This will allow people to adapt their dwellings to suit their needs meaning homes are suitable for more groups and enabling people to stay in their homes for longer reducing pressure on specialist housing.	This may result in people particularly the elderly needing to find alternative accommodation due to mobility issues.
EqIA	++	+	-
	This will allow people to adapt their dwellings to suit their needs meaning homes are suitable for more groups and enabling people to stay in their homes for longer reducing pressure on specialist housing. This would also improve the quality of housing available to wheelchair users which is likely to benefit their health. This would support EqIA protected characteristics 'age' and 'disability'.	This will allow people to adapt their dwellings to suit their needs meaning homes are suitable for more groups and enabling people to stay in their homes for longer reducing pressure on specialist housing. This would support EqIA protected characteristics 'age' and 'disability'.	This may result in people particularly the elderly needing to find alternative accommodation due to mobility issues. This would significantly impact on EqIA protected characteristics 'age' and 'disability'.
10.Crime and Public Safety	0	0	0
	This would have no impact on crime.	This would have no impact on crime.	This would have no impact on crime.
HIA	0	0	0
	This would have no impact on crime.	This would have no impact on crime.	This would have no impact on crime.
EqIA	0	0	0
	This would have no impact on crime and upon the EqIA protected characteristics.	This would have no impact on crime and upon the EqIA protected characteristics	This would have no impact on crime and upon the EqIA protected characteristics
11.Housing	/	/	/
	This may increase the cost of delivering new homes but will also mean more homes are suitable for more of the population.	This may increase the cost of delivering new homes but will also mean more homes are suitable for more of the population.	This would mean homes can continue to be delivered without additional specification and costs, however they may not all be suitable for all of the population.
EqIA	+	+	/
	This may increase the cost of delivering new homes but will also mean more homes are suitable for more of the population and therefore support EqIA protected	This may increase the cost of delivering new homes but will also mean more homes are suitable for more of the population and therefore support EqIA protected	This may result in some residents needing to move to find properties that can meet their needs. It may also result in higher demand for

	characteristics 'age' and 'disability'.	characteristics 'age' and 'disability'.	specialist housing. This could potentially affect EqlA protected characteristics 'age' and 'disability'.
12. Communities	++	+	/
	This will enable homes to be adapted to suit accessibility needs of residents and enable them to remain in their community independently for longer.	This will enable homes to be adapted to suit accessibility needs of residents and enable them to remain in their community independently for longer.	This may result in some residents needing to move to find properties that can meet their needs. It may also result in higher demand for specialist housing.
HIA	+	+	/
	This will enable homes to be adapted to suit accessibility needs of residents and enable them to remain in their community independently for longer which will support their health and well-being.	This will enable homes to be adapted to suit accessibility needs of residents and enable them to remain in their community independently for longer which will support their health and well-being.	This may result in some residents needing to move to find properties that can meet their needs. It may also result in higher demand for specialist housing.
EqlA	+	+	/
	This will enable homes to be adapted to suit accessibility needs of residents and enable them to remain in their community for longer which will support their health and well-being. This will support EqlA protected characteristics 'age' and 'disability'.	This will enable homes to be adapted to suit accessibility needs of residents and enable them to remain in their community for longer which will support their health and well-being. This will support EqlA protected characteristics 'age' and 'disability'.	This may result in some residents needing to move to find properties that can meet their needs. It may also result in higher demand for specialist housing. This could potentially affect EqlA protected characteristics 'age' and 'disability'.
13. Education	0	0	0
	This would have no impact on education.	This would have no impact on education.	This would have no impact on education.
EqlA	0	0	0
	This would have no impact on education and upon the EqlA protected characteristics.	This would have no impact on education and upon the EqlA protected characteristics.	This would have no impact on education and upon the EqlA protected characteristics.
14. Economy	/	/	0
	This is unlikely to have an impact on the local economy, however by increasing the cost of delivering housing could mean building rates and developments are delayed or take longer.	This is unlikely to have an impact on the local economy, however by increasing the cost of delivering housing could mean building rates and developments are delayed or take longer.	This would have no impact on the local economy.
EqlA	0	0	0
	This would have no impact on the local economy and upon the EqlA protected characteristics.	This would have no impact on the local economy and upon the EqlA protected characteristics.	This would have no impact on the local economy and upon the EqlA protected characteristics.
15. Town and Local	0	0	0

Centres	This would have no impact on town and local centres.	This would have no impact on town and local centres.	This would have no impact on town and local centres.
16.Travel and Access	?	0	0
	The requirement to ensure wheelchair user homes have accessible parking areas may decrease the amount of spaces that can be provided in a communal area.	This would have no impact on travel and access.	This would have no impact on travel and access.
<b>Mitigation</b>	Policy wording should ensure that these requirements only apply where feasible and viable to reduce some of the identified potential negative and uncertain impacts. The impact of this policy on viability should be tested.	Include policy wording to recognise that in some developments the requirement to install steps or provide step free access may not be practicable. The impact of this policy on viability should be tested.	None identified.
<b>Conclusions</b>	This option scores very positively in terms of the benefits to the health and wellbeing of individuals and communities by enabling people to remain in their homes for longer and improving the quality and choice of housing available to those with additional mobility issues and those requiring housing accessible for wheelchair users. However there are a number of uncertain and neutral scores which recognise the potential that this may conflict with site constraints and the potential impact on viability.	This option scores positively in terms of the benefits to the health and wellbeing of individuals and communities by enabling people to remain in their homes for longer this would particularly affect older people although would also support those with mobility issues. However the scoring also recognises the potential impact on viability and consequently housing delivery due to increased build costs.	This option scores fairly neutral compared with the baseline however in the longer term this may place greater demand for specialist housing as the population ages if existing homes cannot be adapted.
<b>Conclusions – HIA / EqIA</b>	This option scores very positively in terms of the benefits to the health and wellbeing of individuals and communities by enabling people to remain in their homes for longer and improving the quality and choice of housing available to those with additional mobility issues and those requiring housing accessible for wheelchair users	This option scores positively in terms of the benefits to the health and wellbeing of individuals and communities by enabling people to remain in their homes for longer this would particularly affect older people although would also support those with mobility issues	This option results in a negative effect on healthy lifestyles as this may place greater demand for specialist housing as the population ages if existing homes cannot be adapted.
<b>Recommendation</b>	Option 1: This option scores most positively due to the benefits for the community and health and wellbeing of the widest range of individuals. Although it is recognised that this may increase the cost of building homes, this is outweighed by the social benefits.		

	<b>Policy CP2: Density</b>
	In 2012, Worthing Borough Council adopted a Space Standards SPD to ensure that the floor and storage area space in new residential developments and conversions in Worthing is sufficient to secure a satisfactory standard of accommodation for their residents. In March 2015, the Government published nationally described space standards that replace the existing different standards used by local authorities. The nationally described technical housing standards, which are very similar to those adopted in the SPD for Worthing, provide the nationally recognised standard for bedrooms, storage and internal areas in new dwellings across all tenures. However unlike the local standards these do not include minimum standards for external space.

Options	Option 1: Require new dwellings to meet the minimum nationally described space standards and local standards for external space.	Option 2: Not setting minimum space standards
1. Environmental Quality	0	0
	This would have no impact on environmental quality.	This would have no impact on environmental quality.
2. Biodiversity	0	0
	This would have no impact on biodiversity.	This would have no impact on biodiversity.
3. Land and Soils	0	/
	This would have no impact on land and soils.	Given the limited land available this could result in more dwellings being provided on sites making more effective use of land in light of the local need for housing.
4. Energy	?	0
	The space standards include making sufficient space for waste and recycling which could reduce the amount of waste to landfill.	This would have no impact on energy.
5. Water Management	0	0
	This would have no impact on water management.	This would have no impact on water management.
6. Landscape and Character	0	0
	This would have no impact on landscape and character.	This would have no impact on landscape and character.
7. Built Environment	0	0
	This would have no impact on the built environment.	This would have no impact on the built environment.
8. Historic Environment	0	0
	This would have no impact on the historic environment.	This would have no impact on the historic environment.
9. Healthy Lifestyles	+	-
	The minimum space standards will ensure new homes are an appropriate size to support residents' health and well-being and also their mental health.	Minimum space standards are currently being applied. By not continuing with this Policy in the Local Plan houses may not always be built to an appropriate size to support residents' health and wellbeing and also their mental health.
HIA	+	-
	The minimum space standards will ensure new homes are an appropriate size to support residents' health and well-being and also their mental health.	Minimum space standards are currently being applied. By not continuing with this Policy in the Local Plan houses may not always be built to an appropriate size to support residents' health and wellbeing and also their mental health.
EqIA	+	-
	The minimum space standards will ensure new homes are an appropriate size to support residents' health and well-being and also their mental health. This will support the EqIA protected characteristics 'age' and 'disability'.	Minimum space standards are currently being applied. By not continuing with this Policy in the Local Plan houses may not always be built to an appropriate size to support residents' health and wellbeing and also their mental health. This could

		negatively impact upon the EqIA protected characteristics 'age' and 'disability'.
10.Crime and Public Safety	0	0
	This would have no impact on crime.	This would have no impact on crime.
HIA	0	0
	This would have no impact on crime.	This would have no impact on crime.
EqIA	0	0
	This would have no impact on crime and upon the EqIA protected characteristics.	This would have no impact on crime and upon the EqIA protected characteristics.
11.Housing	/	+
	This will result in homes that better meet people's needs. However the increased cost associated with building larger homes may impact the ability of some smaller sites and delivery of affordable housing.	By not applying this Policy some sites may be able to deliver a higher number of dwellings helping to meet local housing need.
EqIA	+	+
	This will result in homes that better meet people's needs and thus support the EqIA protected characteristics.	By not applying this Policy some sites may be able to deliver a higher number of dwellings helping to meet local housing need and thus support the EqIA protected characteristics.
12.Communities	+	-
	By applying minimum space standards this will ensure people have sufficient space in their homes. This can help build more stable communities improving community cohesion and is also likely to provide the greatest benefit to vulnerable members of the community and those on lower incomes who can only afford the smaller homes available.	By allowing the market to determine, smaller properties may not provide sufficient space, this is likely to negatively impact those that can't afford larger properties and affect community cohesion as people try to move to better properties.
HIA	+	-
	By applying minimum space standards this will ensure people have sufficient space in their homes. This can help build more stable communities improving community cohesion and is also likely to provide the greatest benefit to vulnerable members of the community and those on lower incomes who can only afford the smaller homes available. This also supports people's health and well-being.	By allowing the market to determine, smaller properties may not provide sufficient space, this is likely to negatively impact those that can't afford larger properties and affect community cohesion as people try to move to better properties. This may affect people's health and well-being.
EqIA	+	-
	By applying minimum space standards this will ensure people have sufficient space in their homes. This can help build more stable communities improving community cohesion and is also likely to provide the greatest benefit to vulnerable members of the community and those on lower incomes who can only afford the smaller homes available. This also supports people's health and well-being and therefore supports the EqIA protected characteristics 'age', 'disability' and 'race'.	By allowing the market to determine, smaller properties may not provide sufficient space, this is likely to negatively impact those that can't afford larger properties and affect community cohesion as people try to move to better properties. This may negatively affect people's health and well-being and subsequently impact upon the EqIA protected characteristics 'age', 'disability' and 'race'.
13.Education	0	0



	This would have no impact on education.	This would have no impact on education.
<b>EqlA</b>	<b>0</b>	<b>0</b>
	This would have no impact on education and upon the EqlA protected characteristics.	This would have no impact on education and upon the EqlA protected characteristics.
14.Economy	<b>?</b>	<b>0</b>
	The space standards may help enable home working.	This would have no impact on the local economy.
<b>EqlA</b>	<b>?</b>	<b>0</b>
	The space standards may help enable home working and therefore potentially support EqlA protected characteristics 'age', 'disability', 'pregnancy' and 'race'.	This would have no impact on the local economy and upon the EqlA protected characteristics.
15.Town and Local Centres	<b>0</b>	<b>0</b>
	This would have no impact on town and local centres.	This would have no impact on town and local centres.
16.Travel and Access	<b>?</b>	<b>0</b>
	The space standards include ensuring that there is adequate space for garden storage including bikes which may support sustainable / active travel.	This would have no impact on travel and access.
<b>Mitigation</b>	The impact of this policy on viability should be considered.	None identified.
<b>Conclusions</b>	This option brings the most positive benefits in terms of people's health and wellbeing, and communities. However it is also recognised that there may be a risk in terms of viability that could impact delivery of smaller sites and affordable housing.	This option scores negatively as without minimum space standards homes may not always be a sufficient size to support health and wellbeing. This is likely to specifically impact those on lower incomes exacerbating health inequalities. However this option does score positive in so far as it is recognised that on some sites not having minimum space standards may enable additional dwellings to be delivered.
<b>Conclusions – HIA / EqlA</b>	This option brings the most positive benefits in terms of people's health and wellbeing, housing and communities.	This option scores negatively as without minimum space standards homes may not always be a sufficient size to support health and wellbeing. This is likely to specifically impact those on lower incomes exacerbating health inequalities. However this option does score positive in so far as it is recognised that on some sites not having minimum space standards may enable additional dwellings to be delivered.
<b>Recommendation</b>	Option 1: Subject to viability testing, this scores more positively due to its impact in terms of reducing health inequalities and helping to support stable communities.	

	<b>CP12: Protecting and Enhancing Existing Employment Sites</b>	
	The Employment Land Review identifies a need for additional industrial and office space during the Local Plan.	
<b>Options</b>	<b>Option 1: Protect key industrial estates, business parks and office locations.</b>	<b>Option 2: Avoid the long term protection of employment sites allowing a more flexible approach.</b>
1. Environmental Quality	<b>0</b>	<b>0</b>
	Whether a site is retained in employment use would have no impact on environmental quality.	Whether a site is retained in employment use would have no impact on environmental quality.

2. Biodiversity	0	0
	Whether a site is retained in employment use would have no impact on biodiversity.	Whether a site is retained in employment use would have no impact on environmental quality.
3. Land and Soils	-	+
	Protecting existing sites could result in properties becoming vacant if employment uses become redundant on a particular site.	Allowing a more flexible approach could reduce the likelihood of sites remaining vacant meaning land is used more effectively.
4. Energy	0	/
	Whether a site is retained in employment use is unlikely to have an impact on energy use.	Redevelopment could be more likely without a protection policy which may result in waste during construction.
5. Water Management	0	0
	Whether a site is retained in employment use would have no impact on water management.	Residential properties are likely to have higher water usage depending on the type and size of employment premises.
6. Landscape and Character	0	0
	Whether a site is retained in employment use would have no impact on landscape and character.	Whether a site is retained in employment use would have no impact on landscape and character.
7. Built Environment	0	0
	Whether a site is retained in employment use would have no impact on the built environment.	Whether a site is retained in employment use would have no impact on the built environment.
8. Historic Environment	0	0
	Whether a site is retained in employment use would have no impact on the historic environment.	Whether a site is retained in employment use would have no impact on the historic environment.
9. Healthy Lifestyles	+	-
	Seeking to retain sites in employment use will contribute to a supply of local jobs. Access to good quality jobs can help reduce health inequalities.	The loss of employment space could result in fewer jobs available locally. Depending on the location of the site this could lead to increased unemployment and exacerbate health inequalities.
HIA	+	-
	Seeking to retain sites in employment use will contribute to a supply of local jobs. Access to good quality jobs can help reduce health inequalities.	The loss of employment space could result in fewer jobs available locally. Depending on the location of the site this could lead to increased unemployment and exacerbate health inequalities.
EqIA	+	-
	Seeking to retain sites in employment use will contribute to a supply of local jobs. Access to good quality jobs can help reduce health inequalities and therefore support the EqIA protected characteristics.	The loss of employment space could result in fewer jobs available locally. Depending on the location of the site this could lead to increased unemployment and exacerbate health inequalities and therefore impact on the EqIA protected characteristics.
10. Crime and Public Safety	0	0
	Although an increase in vacant sites could be associated with an increase in crime, there is no direct link identified between retaining a site in employment use and promoting social cohesion / reducing fear of	Although a loss in the number of jobs available locally could be associated with an increase in crime, there is no direct link identified between retaining a site in employment use and promoting social

	crime.	cohesion / reducing fear of crime.
<b>HIA</b>	<b>0</b>	<b>0</b>
	Although an increase in vacant sites could be associated with an increase in crime, there is no direct link identified between retaining a site in employment use and promoting social cohesion / reducing fear of crime / reducing health inequalities.	Although a loss in the number of jobs available locally could be associated with an increase in crime, there is no direct link identified between retaining a site in employment use and promoting social cohesion / reducing fear of crime / reducing health inequalities.
<b>EqIA</b>	<b>0</b>	<b>0</b>
	Although an increase in vacant sites could be associated with an increase in crime, there is no direct link identified between retaining a site in employment use and promoting social cohesion / reducing fear of crime / reducing health inequalities and therefore no direct link to the EqIA protected characteristics.	Although a loss in the number of jobs available locally could be associated with an increase in crime, there is no direct link identified between retaining a site in employment use and promoting social cohesion / reducing fear of crime / reducing health inequalities and therefore no direct link to the EqIA protected characteristics.
11.Housing	<b>-</b>	<b>++</b>
	Seeking to retain sites in employment use will result in less land available within the Plan area for other uses including housing which will reduce the ability to meet local housing need.	Given the level of housing need, a more flexible approach to sites currently in an employment use may result in more opportunities to deliver housing that meets local housing need.
<b>EqIA</b>	<b>-</b>	<b>++</b>
	Seeking to retain sites in employment use will result in less land available within the Plan area for other uses including housing which will reduce the ability to meet local housing need. This will negatively affect EqIA protected characteristics such as 'age', 'disability' and 'race'.	Given the level of housing need, a more flexible approach to sites currently in an employment use may result in more opportunities to deliver housing that meets local housing need. This will support EqIA protected characteristics 'age', 'disability' and 'race'.
12.Communities	<b>+</b>	<b>+</b>
	The retention and enhancement of employment uses should benefit communities by safeguarding jobs for both residents and those that commute into the local area.	A more flexible approach to sites currently in an employment use may result in more sites and opportunities to deliver community uses.
<b>HIA</b>	<b>+</b>	<b>+</b>
	The retention and enhancement of employment uses should benefit communities by safeguarding jobs for both residents and those that commute into the local area.	A more flexible approach to sites currently in an employment use may result in more sites and opportunities to deliver community uses.
<b>EqIA</b>	<b>+</b>	<b>+</b>
	The retention and enhancement of employment uses should benefit communities by safeguarding jobs for both residents and those that commute into the local area. This will support EqIA protected characteristics.	A more flexible approach to sites currently in an employment use may result in more sites and opportunities to deliver community uses. This will support EqIA protected characteristics.
13.Education	<b>/</b>	<b>/</b>
	Seeking to retain sites in employment use will contribute to a supply of local jobs. This may help residents to remain in work and access good quality jobs. However this	A more flexible approach to sites currently in an employment use could result in a reduction in the number of jobs available locally. However this wouldn't necessary

	wouldn't necessary directly impact educational achievement.	directly impact educational achievement.
<b>EqlA</b>	<b>0</b>	<b>0</b>
	There is no link between this option and the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.
14.Economy	<b>++</b>	<b>--</b>
	The retention and enhancement of B1, B2 and B8 employment uses should provide opportunities for the creation of jobs and have an overall positive impact on the local economy.	By not having a specific policy to protect and enhance existing employment sites there would likely be pressure for loss to non-employment activities, reducing employment opportunities within the Plan area. With a lack of new land to bring forward new employment land this could overall result in a loss of employment space in the long term.
<b>EqlA</b>	<b>++</b>	<b>--</b>
	The retention and enhancement of B1, B2 and B8 employment uses should provide opportunities for the creation of jobs and have an overall positive impact on the local economy and therefore support the EqlA protected characteristics.	By not having a specific policy to protect and enhance existing employment sites there would likely be pressure for loss to non-employment activities, reducing employment opportunities within the Plan area. With a lack of new land to bring forward new employment land this could overall result in a loss of employment space in the long term and lead to reduced employment opportunities therefore impacting upon the EqlA protected characteristics.
15.Town and Local Centres	<b>+</b>	<b>-</b>
	The continued presence of employment uses within or close to centres can support their vitality and viability.	The potential loss of employment uses within centres could negatively impact on their vitality and vibrancy through a reduction in the number of people visiting and spending in the local area.
16.Travel and Access	<b>+</b>	<b>-</b>
	By resisting the loss of employment uses, it may reduce the need for commuting out of the area although there is no guarantee that jobs within the District will be taken up by local residents.	A loss in employment space and corresponding jobs may mean more residents have to commute further for work.
<b>Mitigation</b>	To mitigate the potential negative effects resulting from vacant properties, wording should be included in the policy to allow the release of those sites that are genuinely redundant or vacant for long periods.	Include a policy within the Local Plan which makes reference to waste minimisation, and recycling during the construction phase of development.
<b>Conclusions</b>	Option 1 would support local economic growth bringing very positive effects for the local economy. The safeguarding of local jobs also brings positive effects for local communities and may contribute to a reduction in inequalities as well as supporting the town and local centres. However it is recognised that protecting employment sites may negatively impact housing delivery. In addition the appraisal has highlighted negative effects should employment uses on a site become redundant resulting in vacant properties.	Option 2 scores positively in terms of enabling a more flexible approach to uses which may help ensure a more effective use of land. However it scores very negatively due to the potential loss of employment space to non-employment uses, reducing employment opportunities within the Plan area. This consequently also scores negatively due to the potential loss of jobs which may increase local unemployment and exacerbate health inequalities.
<b>Conclusions – HIA / EqlA</b>	Option 1 would support local economic growth bringing very positive effects for the local economy. The safeguarding of local	Option 2 scores very negatively due to the potential loss of employment space to non-employment uses, reducing employment

	jobs also brings positive effects for local communities and may contribute to a reduction in health inequalities. However it is recognised that protecting employment sites may negatively impact housing delivery.	opportunities within the Plan area. This consequently also scores negatively due to the potential loss of jobs which may increase local unemployment and exacerbate health inequalities.
<b>Recommendation</b>	Option 1: This option scores more positively overall and is therefore the most sustainable.	

	<b>Policy CP14: Retail and Main Town Centre Uses</b>	
	The Retail Study recommended a change in boundary to some shopping areas which would result in a reduction in the area within which only retail uses would be allowed and an increase in the area within which wider uses would be encouraged. It also recommended increasing flexibility within District Centres.	
<b>Options</b>	<b>Option 1: Increase in flexibility</b>	<b>Option 2: Retain existing approach</b>
1. Environmental Quality	<b>0</b> Whether greater flexibility is allowed for non-retail uses will have no impact on environmental quality.	<b>0</b> Retaining the existing approach for town and district centres will have no impact on environmental quality.
2. Biodiversity	<b>0</b> Whether greater flexibility is allowed for non-retail uses will have no impact on biodiversity.	<b>0</b> Retaining the existing approach for town and district centres will have no impact on biodiversity.
3. Land and Soils	<b>0</b> Whether greater flexibility is allowed for non-retail uses will have no impact on land and soils.	<b>0</b> Retaining the existing approach for town and district centres will have no impact on land and soils.
4. Energy	<b>0</b> Whether greater flexibility is allowed for non-retail uses will have no impact on energy use.	<b>0</b> Retaining the existing approach for town and district centres will have no impact on energy use.
5. Water Management	<b>0</b> Whether greater flexibility is allowed for non-retail uses is unlikely to impact on water management. However some non-retail uses may have higher water usage.	<b>0</b> Retaining the existing approach for town and district centres will have no impact on water management
6. Landscape and Character	<b>0</b> Whether greater flexibility is allowed for non-retail uses will have no impact on landscape and character.	<b>0</b> Retaining the existing approach for town and district centres will have no impact on landscape and character.
7. Built Environment	<b>0</b> Whether greater flexibility is allowed for non-retail uses will have no impact on the quality of the built environment.	<b>0</b> Retaining the existing approach for town and district centres will have no impact on the quality of the built environment.
8. Historic Environment	<b>0</b> Whether greater flexibility is allowed for non-retail uses will have no impact on the historic environment.	<b>0</b> Retaining the existing approach for town and district centres will have no impact on the historic environment.
9. Healthy Lifestyles	<b>+</b> Allowing greater flexibility particularly in district centres may enable them to better meet the needs of local residents including providing local health services.	<b>/</b> Retaining the existing approach for town and district centres is unlikely to impact on healthy lifestyles.

<b>HIA</b>	+	/
	Allowing greater flexibility particularly in district centres may enable them to better meet the needs of local residents including providing local health services	Retaining the existing approach for town and district centres is unlikely to impact on healthy lifestyles.
<b>EqIA</b>	+	/
	Allowing greater flexibility particularly in district centres may enable them to better meet the needs of local residents including providing local health services. This will support EqIA protected characteristics.	Retaining the existing approach for town and district centres is unlikely to impact on healthy lifestyles and therefore unlikely to impact upon the EqIA protected characteristics.
10.Crime and Public Safety	+	/
	Allowing greater flexibility will help sustain the vitality and vibrancy of Worthing's retail centres by minimising vacancy rates and increasing footfall particularly in the early evening when retail units normally close	Retaining the existing approach for town and district centres is unlikely to impact crime and public safety.
<b>HIA</b>	0	0
	Whether greater flexibility is allowed for non-retail uses will have no impact on crime and public safety with regards to health and well-being.	Retaining the existing approach for town and district centres is unlikely to impact crime and public safety with regards to health and well-being.
<b>EqIA</b>	0	0
	Whether greater flexibility is allowed for non-retail uses will have no impact on crime and public safety and the EqIA protected characteristics.	Retaining the existing approach for town and district centres is unlikely to impact on crime and public safety and the EqIA protected characteristics.
11.Housing	0	0
	Whether greater flexibility is allowed for non-retail uses will have no impact on the provision of housing	Retaining the existing approach for town and district centres will have no impact on the provision of housing.
<b>EqIA</b>	0	0
	Whether greater flexibility is allowed for non-retail uses will have no impact on the provision of housing and the EqIA protected characteristics.	Retaining the existing approach for town and district centres will have no impact on the provision of housing and the EqIA protected characteristics.
12.Communities	+	/
	Allowing greater flexibility will help ensure that the vitality and viability of Worthing centres are able to continue to provide retail floorspace, whilst also provide a diverse range of services, including everyday essential services, to meet local needs.	Retaining the existing approach for town and district centres is unlikely to impact communities.
<b>HIA</b>	+	/
	Allowing greater flexibility will help ensure that the vitality and viability of Worthing centres are able to continue to provide retail floorspace, whilst also provide a diverse range of services, including health services, to meet local needs.	Retaining the existing approach for town and district centres is unlikely to impact communities.
<b>EqIA</b>	+	/
	Allowing greater flexibility will help ensure that the vitality and viability of Worthing centres are able to continue to provide retail floorspace, whilst also provide a diverse range of services, including health services, to meet local needs. This will	Retaining the existing approach for town and district centres is unlikely to impact communities and upon the EqIA protected characteristics.

	help support EqlA protected characteristics.	
13.Education	0	0
	Whether greater flexibility is allowed for non-retail uses will have no impact on education.	Retaining the existing approach for town and district centres will have no impact on education.
EqlA	0	0
	Whether greater flexibility is allowed for non-retail uses will have no impact on education and upon the EqlA protected characteristics.	Retaining the existing approach for town and district centres will have no impact on education and upon the EqlA protected characteristics.
14.Economy	+	/
	Allowing greater flexibility will support the vitality and viability Worthing's retail hierarchy and facilitate sustainable economic growth.	Retaining the existing approach for town and district centres will continue to support the local economy, however may not maximise opportunities for economic growth
EqlA	+	/
	Allowing greater flexibility will support the vitality and viability Worthing's retail hierarchy and facilitate sustainable economic growth. This may support EqlA protected characteristics 'age', 'disability' and 'race'.	Retaining the existing approach for town and district centres will continue to support the local economy, however may not maximise opportunities for economic growth and may impact on EqlA protected characteristics.
15.Town and Local Centres	+	/
	Allowing greater flexibility will support and strengthen the vitality and viability of Worthing's retail hierarchy	Retaining the existing approach for town and district centres will continue to support their vitality and viability however may not maximise opportunities to respond to changes and vacancies
16.Travel and Access	+	/
	Allowing greater flexibility will mean people can access more goods and services without the need to travel.	Retaining the existing approach for town and district centres will continue to support local communities but may miss opportunities to provide better access to services.
Mitigation	None identified	None identified.
Conclusions	This option scores as having positive effects against social and economic objectives with no negative effects identified.	This option scores as having neutral effects overall against social and economic objectives.
Conclusions – HIA / EqlA	This option scores as having positive effects against social and economic objectives with no negative effects identified.	This option scores as having neutral effects overall against social and economic objectives.
Recommendation	Option 1 allowing greater flexibility scores more positively overall and is therefore the most sustainable.	

	Policy CP17: Sustainable Design	
	Following the Housing Standards Review, the government set new optional technical standards. For water, the current mandatory standard remains at 125 litres/person/day. The optional higher standard is 110l/p/d to apply there must be a local plan policy in place. Worthing is within an area defined as being of Serious	Include measures for the energy efficiency of new and existing residential and non-residential buildings or rely on existing minimum standards. The Policy sets out minimum requirements including a 19% reduction in CO2 emissions below current Building Regulations for new dwellings, a minimum Energy Performance Certification C rating for all new and existing



	Water Stress.		buildings and BREEAM excellent rating for major non-residential floorspace.	
Options	<b>Option 1a Require optional higher Building Regulations standard on water efficiency</b>	<b>Option 1b Rely on current standards</b>	<b>Option 2a. Require minimum sustainability standards (including carbon emissions, energy efficiency standards and BREEAM rating)</b>	<b>Option 2b. Rely on current standard</b>
1. Environmental Quality	<b>++</b>	<b>/</b>	<b>0</b>	<b>0</b>
	Worthing is in an area of Serious Water Stress (2013). Higher water efficiency measures will help conserve water resources reducing the impact of over abstraction on the environment.	Worthing is in an area of Serious Water Stress (2013). Although this will provide some efficiency in water use there will be no improvement based on the current situation.	This option would have no impact on environmental quality.	This option would have no impact on environmental quality.
2. Biodiversity	<b>++</b>	<b>/</b>	<b>0</b>	<b>0</b>
	Worthing is in an area of Serious Water Stress (2013). Higher water efficiency measures will help conserve water resources reducing the impact of over abstraction on the environment.	This will not provide any additional benefits in terms of reducing the impact of over abstraction on the natural environment.	This option would have no impact on land and soils.	This option would have no impact on land and soils.
3. Land and Soils	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	This option would have no impact on land and soils.	This option would have no impact on land and soils.	This option would have no impact on land and soils.	This option would have no impact on land and soils.
4. Energy	<b>/</b>	<b>/</b>	<b>++</b>	<b>/</b>
	Some higher water efficiency measures do have a carbon implication such as greywater recycling. However this shouldn't be required to achieve this level.	Some higher water efficiency measures do have a carbon implication such as greywater recycling. However this shouldn't be required to achieve this level.	Further reducing carbon emissions and improving the energy efficiency of buildings will help mitigate climate change.	This would not provide any additional benefits in terms of reducing carbon emissions
5. Water Management	<b>++</b>	<b>/</b>	<b>+</b>	<b>0</b>
	Worthing is in an area of Serious Water Stress (2013). Higher water efficiency measures will help conserve water resources and adapt to the effects of climate change such as periods of drought.	This will not provide any additional benefits in terms of conserving water resources to adapt to the effects of climate change.	There is no direct link between this option and water management, however achievement of the BREEAM standard will likely also bring benefits in terms of water efficiency measures and the use of SuDS	There is no link between this option and water management.



6. Landscape and Character	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and landscape and character.	There is no link between this option and landscape and character.	There is no link between this option and landscape and character.	There is no link between this option and landscape and character.
7. Built Environment	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and the built environment.	There is no link between this option and the built environment.	There is no link between this option and the built environment.	There is no link between this option and the built environment.
8. Historic Environment	<b>0</b>	<b>0</b>	<b>-</b>	<b>0</b>
	There is no link between this option and the historic environment.	There is no link between this option and the historic environment.	The implementation of some energy efficiency measures such as double glazing could impact historic buildings. The Policy should make allowance for this.	There is no link between this option and the historic environment.
9. Healthy Lifestyles	<b>0</b>	<b>0</b>	<b>+</b>	<b>0</b>
	There is no link between this option and healthy lifestyles.	There is no link between this option and healthy lifestyles.	By making homes cheaper to heat this may benefit the health of people on low incomes as it may mean it is more likely that they are able to live in and heat a home to an appropriate temperature.	There is no link between this option and healthy lifestyles.
<b>HIA</b>	<b>0</b>	<b>0</b>	<b>+</b>	<b>0</b>
	There is no link between this option and healthy lifestyles.	There is no link between this option and healthy lifestyles.	By making homes cheaper to heat this may benefit the health of people on low incomes as it may mean it is more likely that they are able to live in and heat a home to an appropriate temperature and therefore reduce those living in fuel poverty.	There is no link between this option and healthy lifestyles.
<b>EqlA</b>	<b>0</b>	<b>0</b>	<b>+</b>	<b>0</b>
	There is no link between this option and the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.	This option may benefit the health and well-being of people on low incomes therefore there support the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.
10. Crime and Public Safety	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and crime and public safety.	There is no link between this option and crime and public safety.	There is no link between this option and crime and public safety.	There is no link between this option and crime and public safety.

<b>HIA</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and crime and public safety.	There is no link between this option and crime and public safety.	There is no link between this option and crime and public safety.	There is no link between this option and crime and public safety.
<b>EqlA</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.
11.Housing	-	/	-	/
	The increased cost associated with this option may compromise viability of some smaller schemes.	This option should not have a positive or negative impact on the delivery of housing.	The increased cost associated with this option may compromise viability of some smaller schemes.	This option should not have a positive or negative impact on the delivery of housing.
<b>EqlA</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.	There is no link between this option and the EqlA protected characteristics.
12.Communities	+	/	+	/
	Water efficiency measures should result in less water consumed and therefore lower water bills which could benefit people on lower incomes.	This option should not have a positive or negative impact on local communities	The energy efficiency measures likely to be used to meet this requirement and achievement of a higher EPC will also make homes cheaper to heat which will benefit people on lower incomes.	This option should not have a positive or negative impact on local communities
<b>HIA</b>	+	/	+	/
	This will improve the health and well-being of those on lower incomes as it will mean that they have improved access to water.	This option should not have a positive or negative impact on the health of local communities	This will improve the health and well-being of those on lower incomes as it will mean less people living in fuel poverty.	This option should not have a positive or negative impact on the health of local communities.
<b>EqlA</b>	+	/	+	/
	This will improve the health and well-being of those on lower incomes as it will mean that they have improved access to water and therefore support the EqlA protected characteristics.	This option should not have a positive or negative impact on the health of local communities	This will improve the health and well-being of those on lower incomes as it will mean less people living in fuel poverty and therefore support the EqlA protected characteristics.	This option should not have a positive or negative impact on the health of local communities.
13.Education	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and education.	There is no link between this option and	There is no link between this option and education.	There is no link between this option and education.

		education.		
EqIA	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and EqIA protected characteristics.	There is no link between this option and EqIA protected characteristics.	There is no link between this option and EqIA protected characteristics.	There is no link between this option and EqIA protected characteristics.
14.Economy	<b>?</b>	<b>/</b>	<b>?</b>	<b>/</b>
	This option could help reduce the impact of droughts which could have an impact on the local economy.	This option should not have a positive or negative impact on the local economy.	This option could help mitigate climate change which may therefore have a positive impact on the economy, however in reality the impact of this on the global climate is likely to be minimal	This option should not have a positive or negative impact on the local economy.
EqIA	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and EqIA protected characteristics.	There is no link between this option and EqIA protected characteristics.	There is no link between this option and EqIA protected characteristics.	There is no link between this option and EqIA protected characteristics.
15.Town and Local Centres	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and town and local centres	There is no link between this option and town and local centres.	There is no link between this option and town and local centres.	There is no link between this option and town and local centres
16.Travel and Access	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	There is no link between this option and travel and access.	There is no link between this option and travel and access.	There is no link between this option and travel and access.	There is no link between this option and travel and access.
<b>Mitigation</b>	This policy should be informed by viability work to understand the potential impact on the delivery of smaller sites.	None identified.	This policy should be informed by viability work to understand the potential impact on the delivery of smaller sites. It should also include allowances for historic buildings as some measures to reduce emissions may not be appropriate.	None identified
<b>Conclusions</b>	This option brings significant positive impacts in terms of the environment, climate change adaption, communities and possibly the local economy. However it is acknowledged that there may be cost implications which could impact the delivery of housing particularly on smaller sites.	Option 1b brings mostly neutral effects reflecting that there is no change from the baseline situation.	This option brings positive effects in terms of energy in relation to climate change mitigation, health and communities due to the potential lower energy costs. However there are potential negative effects due to the impact on historic buildings and viability for smaller sites. Mitigation has been identified which should	The option to rely on current standards brings mostly neutral effects reflecting that it presents no change to the baseline situation. Therefore comparatively it is likely to bring fewer benefits in terms of climate change mitigation but equally less potential to negatively impact on housing delivery due

			be incorporated within the Local Plan.	to viability.
<b>Conclusions – HIA / EqlA</b>	This option brings significant positive impacts in terms communities and possibly the local economy. However it is acknowledged that there may be cost implications which could impact the delivery of housing particularly on smaller sites. There is no link between this option and healthy lifestyles.	There is a neutral effect scored for communities. There is no link between this option and healthy lifestyles, crime and public safety, housing, education and economy.	This option brings positive effects in terms of energy in relation health and communities due to the potential lower energy costs.	There are neutral effects scored for communities. There is no link between this option and healthy lifestyles, crime and public safety, housing, education and economy.
<b>Recommendation</b>	Subject to viability testing, Option 1a: to set a higher optional standard for water efficiency brings more significant positive impacts.		Subject to the mitigation identified Option 2a is the most sustainable option.	

## APPENDIX D3: APPRAISAL OF DRAFT LOCAL PLAN

Draft Local Plan		Objective 1. Environmental Quality	
Part 2 Spatial Strategy	SP2 Spatial Strategy	-	The provision of new development is likely to worsen air quality as a result of increased traffic generated by development.
	SP3 Development Sites	-	The delivery of the levels of development specified in the policy will likely impact air quality as a result of the traffic generated. This is addressed through other policies in the Plan.
	SP4 Countryside and Undeveloped Coast	0	This policy would not improve environmental quality or reduce pollution.
	SP5 Local Gaps	0	This policy would not improve environmental quality or reduce pollution.
	SP6 Local Green Space	0	This policy would not improve environmental quality or reduce pollution.
Part 3 Development Sites	A1 Caravan Club	0	This policy would not improve environmental quality or reduce pollution.
	A2 Land west of Fulbeck Ave	0	This policy would not improve environmental quality or reduce pollution.
	A3 Upper Brighton Road	-	Negative effect – the option would be in conflict with the objective due to the close proximity of the designated Air Quality Management Area
	A4 Decoy Farm	?	Uncertain - more information needed to understand the potential impacts of development on the Teville Stream
	A5 Teville Gate	0	This policy would not improve environmental quality or reduce pollution.
	A6 Union Place	0	This policy would not improve environmental quality or reduce pollution.
	A7 Grafton	0	This policy would not improve environmental quality or reduce pollution.
	A8 Civic Centre Car Park	0	This policy would not improve environmental quality or reduce pollution.
	AOC1 Centenary House	0	This policy would not improve environmental quality or reduce pollution.
	AOC2 British Gas Site, Lyndhurst Rd	0	This policy would not improve environmental quality or reduce pollution.
	AOC3 Stagecoach, Marine Parade	0	This policy would not improve environmental quality or reduce pollution.
	AOC4 Worthing Leisure Centre	0	This policy would not improve environmental quality or reduce pollution.
	AOC5 HMRC Offices, Barrington Rd	0	This policy would not improve environmental quality or reduce pollution.
	AOC6 Martlets Way	0	This policy would not improve environmental quality or reduce pollution.

	<b>OS1 Land east of Titnore Lane</b>	0	This policy would not improve environmental quality or reduce pollution.
	<b>OS2 Land north of Beeches Ave</b>	-	Negative effect – the option would be in conflict with the objective due to the close proximity of the designated Air Quality Management Area
	<b>OS3 Worthing United Football Club</b>	-	Negative effect – the option would be in conflict with the objective due to the close proximity of the designated Air Quality Management Area
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	/	The policy requires any proposals for new sites to be served or capable of being served by an adequate mains drainage and sewerage connections which will help protect water quality.
	<b>CP5 Quality of the Built Environment</b>	0	This policy will have no impact on this objective
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	/	The policy aims to improve environmental sustainability and reduce contributors to poor health such as those associated with hazardous uses and poor air quality. However the positive effects could be maximised by making specific reference to reducing pollution
	<b>CP8 Open Space, Recreation and Leisure</b>	0	This policy will have no impact on this objective
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective
	<b>CP10 Delivering Infrastructure</b>	+	The policy will help ensure there is sufficient capacity in infrastructure to support the demands of existing and new development, reducing the likelihood of pollution incidents.
	<b>CP11 Economic Growth and Skills</b>	0	This policy will have no impact on this objective
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	+	The policy requires schemes to mitigate any potential noise, odour traffic or other impacts so as not to cause

			an unacceptable impact on the environment.
	<b>CP19 Biodiversity</b>	+	The policy seeks biodiversity enhancements this may also indirectly improve environmental quality
	<b>CP20 Green Infrastructure</b>	+	Enhancing green infrastructure assets may also improve environmental quality.
	<b>CP21 Flood Risk and Sustainable Drainage</b>	+	This policy requires that opportunities should be taken to improve water quality through the use of Sustainable Drainage Systems.
	<b>CP22 Water Quality and Protection</b>	++	This policy seeks to ensure that development does not have an unacceptable impact on water quality and that it protects and enhances water quality.
	<b>CP23 Pollution</b>	++	This policy seeks to ensure that development is not at risk from or results in unacceptable levels of pollution.
	<b>CP24 Transport and Connectivity</b>	?	This policy promotes and support development that encourages travel by walking, cycling and public transport which may help prevent an increase in congestion and consequent impacts on air quality.
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 2. Biodiversity	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	/	New developments particularly on greenfield sites around the edge of town are likely to impact on biodiversity. However the protection of open spaces, countryside and gaps will help preserve a number of sites and the habitats they provide.
	<b>SP3 Development Sites</b>	-	The delivery of the levels of development specified in the policy has the potential to impact biodiversity through a loss of habitats. This is addressed through other policies in the Plan.
	<b>SP4 Countryside and Undeveloped Coast</b>	+	This policy would conserve and protect habitats located on land outside the Built Up Area Boundary
	<b>SP5 Local Gaps</b>	+	This policy would conserve and protect habitats located on land within the Local Gaps.
	<b>SP6 Local Green Space</b>	+	This policy would conserve and protect habitats located on these sites from inappropriate development.
Part 3 Development Sites	<b>A1 Caravan Club</b>	-	Development of this site will have a negative impact on this objective.
	<b>A2 Land west of Fulbeck Ave</b>	-	Development of this site will have a negative impact on this objective.
	<b>A3 Upper Brighton Road</b>	-	Development of this site will have a negative impact on this objective.
	<b>A4 Decoy Farm</b>	-	Development of this site will have a negative impact on this objective.
	<b>A5 Teville Gate</b>	0	This policy will have no impact on this objective
	<b>A6 Union Place</b>	0	This policy will have no impact on this objective
	<b>A7 Grafton</b>	0	This policy will have no impact on this objective
	<b>A8 Civic Centre Car Park</b>	0	This policy will have no impact on this objective

	<b>AOC1 Centenary House</b>	0	This policy will have no impact on this objective
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	0	This policy will have no impact on this objective
	<b>AOC3 Stagecoach, Marine Parade</b>	0	This policy will have no impact on this objective
	<b>AOC4 Worthing Leisure Centre</b>	0	This policy will have no impact on this objective
	<b>AOC5 HMRC Offices, Barrington Rd</b>	0	This policy will have no impact on this objective
	<b>AOC6 Martlets Way</b>	0	This policy will have no impact on this objective
	<b>OS1 Land east of Titnore Lane</b>	-	Development of this site will have a negative impact on this objective.
	<b>OS2 Land north of Beeches Ave</b>	-	Development of this site will have a negative impact on this objective.
	<b>OS3 Worthing United Football Club</b>	/	Development of this site would have a neutral impact on this objective
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective
	<b>CP5 Quality of the Built Environment</b>	+	The policy requires that developments should contribute positively to biodiversity.
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	0	This policy will have no impact on this objective
	<b>CP8 Open Space, Recreation and Leisure</b>	+	The provision of new open space could provide net gains in biodiversity
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective
	<b>CP10 Delivering Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP11 Economic Growth and Skills</b>	0	This policy will have no impact on this objective
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	+	This policy seeks to protect and enhance biodiversity, and achieve net gains.
	<b>CP20 Green Infrastructure</b>	+	This policy aims to create, protect, enhance and manage green infrastructure assets and networks. This will help create and protect wildlife corridors and spaces for biodiversity.
	<b>CP21 Flood Risk and Sustainable Drainage</b>	+	This policy requires that opportunities should be taken to increase biodiversity through the use of Sustainable Drainage Systems.



	<b>CP22 Water Quality and Protection</b>	+	This policy will benefit and improve water habitats that support biodiversity.
	<b>CP23 Pollution</b>	+	This policy will help ensure that nature conservation interests are protected from pollution,
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 3. Land and Soils	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	+	The policy requires development to make efficient use of previously developed land
	<b>SP3 Development Sites</b>	?	It is unclear from this policy whether development is being directed towards brownfield land first and whether the best and most versatile agricultural land will be protected.
	<b>SP4 Countryside and Undeveloped Coast</b>	+	This policy would protect areas of the best and most versatile agricultural land located outside of the Built Up Area Boundary
	<b>SP5 Local Gaps</b>	+	This policy would protect areas of the best and most versatile agricultural land located within the Local Gaps
	<b>SP6 Local Green Space</b>	0	This policy would have no intentional impact on land and soils, though may inadvertently protect areas of the best and most versatile agricultural land located within these sites
Part 3 Development Sites	<b>A1 Caravan Club</b>	-	Development of part of the caravan club would have a negative impact on of this objective as the existing site is largely undeveloped.
	<b>A2 Land west of Fulbeck Ave</b>	-	Development of this site would have a negative impact on of this objective as the existing site is undeveloped.
	<b>A3 Upper Brighton Road</b>	--	Development of this site would have a negative impact on of this objective as the existing site (used a paddock and arable fields) is undeveloped.
	<b>A4 Decoy Farm</b>	+	Although the site is largely undeveloped it is a former landfill. Therefore, development will support the remediation of contamination as part of the redevelopment. This will have a positive impact on this objective.
	<b>A5 Teville Gate</b>	++	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.
	<b>A6 Union Place</b>	++	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.
	<b>A7 Grafton</b>	++	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.

	<b>A8 Civic Centre Car Park</b>	++	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.
	<b>AOC1 Centenary House</b>	++	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	++	The redevelopment of this brownfield site will make efficient use of land, will remediate contamination and will re-use previously developed land. This will have a very positive impact on this objective.
	<b>AOC3 Stagecoach, Marine Parade</b>	++	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.
	<b>AOC4 Worthing Leisure Centre</b>	?	At this stage it is unclear whether the existing playing fields / open spaces will form part of any future redevelopment of this site.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	++	The redevelopment of this brownfield site will make efficient use of land and will re-use previously developed land. This will have a very positive impact on this objective.
	<b>AOC6 Martlets Way</b>	++	The redevelopment of this brownfield site will make efficient use of land, will remediate contamination and will re-use previously developed land. This will have a very positive impact on this objective.
	<b>OS1 Land east of Titnore Lane</b>	-	Development of this site would have a negative impact on of this objective as the existing site is undeveloped.
	<b>OS2 Land north of Beeches Ave</b>	--	Development of this site would have a negative impact on of this objective as the existing site (used a paddock and grazing land) is largely undeveloped.
	<b>OS3 Worthing United Football Club</b>	-	Development of this site would have a negative impact on of this objective as a result of the potential loss of the existing football pitch.
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	/	Minimum densities will ensure the most efficient use of land however it won't necessarily promote the use of brownfield land first.
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective
	<b>CP5 Quality of the Built Environment</b>	0	This policy will have no impact on this objective
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	0	This policy will have no impact on this objective
	<b>CP8 Open Space, Recreation and Leisure</b>	0	This policy will have no impact on this objective
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective

	<b>CP10 Delivering Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP11 Economic Growth and Skills</b>	+	The policy aims to make more efficient use of existing and underused and accessible employment sites and identify renewal opportunities for underutilised and vacant premises.
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	/	The policy approach to protect existing premises for business purposes against loss to other uses could result in vacant sites and the ineffective use of land. However the policy does allow for some flexibility especially outside the protected employment areas which should minimise the likelihood of vacant premises.
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	++	This policy supports remediation of contaminated land
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 4. Energy	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	-	The provision of new development is likely to increase carbon emissions through construction and occupation. Other policies in the Plan seek to mitigate this impact
	<b>SP3 Development Sites</b>	-	The delivery of the levels of development specified in the policy is likely to result in increased carbon emissions through the construction and operation phases of development. Other policies in the Plan seek to mitigate this impact.
	<b>SP4 Countryside and Undeveloped Coast</b>	0	This policy would have no impact on energy use
	<b>SP5 Local Gaps</b>	0	This policy would have no impact on energy use
	<b>SP6 Local Green Space</b>	0	This policy would have no impact on energy use

Part 3 Development Sites	<b>A1 Caravan Club</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>A2 Land west of Fulbeck Ave</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>A3 Upper Brighton Road</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>A4 Decoy Farm</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>A5 Teville Gate</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>A6 Union Place</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>A7 Grafton</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>A8 Civic Centre Car Park</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>AOC1 Centenary House</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>AOC3 Stagecoach, Marine Parade</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>AOC4 Worthing Leisure Centre</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.

	<b>AOC6 Martlets Way</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>OS1 Land east of Titnore Lane</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>OS2 Land north of Beeches Ave</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
	<b>OS3 Worthing United Football Club</b>	-	Development is likely to cause increased emissions and waste, contributing to climate change unless fully mitigated. This will have a negative impact on this objective.
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective
	<b>CP5 Quality of the Built Environment</b>	0	This policy will have no impact on this objective
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	/	The policy makes reference to improving environmental sustainability which may support energy efficiency measures
	<b>CP8 Open Space, Recreation and Leisure</b>	0	This policy will have no impact on this objective
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective
	<b>CP10 Delivering Infrastructure</b>	?	The policy will ensure there is sufficient capacity in energy infrastructure to support existing and new developments. However the infrastructure items themselves may also result in increased energy use.
	<b>CP11 Economic Growth and Skills</b>	0	This policy will have no impact on this objective
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	++	This policy sets minimum requirements to reduce carbon emissions, implement energy efficiency measures and promote the use of low and zero carbon energy.
	<b>CP18 Energy</b>	++	This policy supports proposals for the development of renewable, low carbon or decentralised energy schemes.

	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 5. Water Management	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	-	The provision of new development is likely to increase demand for water. Other policies in the Plan seek to mitigate this impact.
	<b>SP3 Development Sites</b>	-	The delivery of the levels of development specified in the policy is likely to increase demand for water. Other policies in the Plan seek to mitigate this impact.
	<b>SP4 Countryside and Undeveloped Coast</b>	0	This policy would have no impact on water management
	<b>SP5 Local Gaps</b>	0	This policy would have no impact on water management
	<b>SP6 Local Green Space</b>	+	This policy provides protection to the function of Brooklands Lake in providing drainage and flood prevention relief
Part 3 Development Sites	<b>A1 Caravan Club</b>	+	A breach of the dam has previously caused flooding in the local area - adopting the sequential approach so that the most vulnerable uses are located in the areas at lowest risk of flooding will have a positive impact on this objective.
	<b>A2 Land west of Fulbeck Ave</b>	+	A breach of the dam has previously caused flooding in the local area - adopting the sequential approach so that the most vulnerable uses are located in the areas at lowest risk of flooding will have a positive impact on this objective.
	<b>A3 Upper Brighton Road</b>	0	This policy would have no impact on water management
	<b>A4 Decoy Farm</b>	+	Parts of the site lie within Flood Zone 3. Therefore development in this location would place additional people at risk of flooding. Managing flood risk and adopting the sequential approach so that the most vulnerable uses are located in the areas at lowest risk of flooding will have a positive impact on this objective.
	<b>A5 Teville Gate</b>	+	The site is in an area at risk from both surface water and groundwater flooding - the incorporation of SuDs as part of the redevelopment will have a positive impact on this objective.
	<b>A6 Union Place</b>	+	Parts of the site are at risk from both surface water flooding. Surface water attenuation and improved drainage will have a positive impact on this objective.



	<b>A7 Grafton</b>	+	The majority of the site is in Flood Zone 3. Therefore development in this location would place additional people at risk of flooding. However adopting the sequential approach will have a positive impact on this objective.
	<b>A8 Civic Centre Car Park</b>	0	This policy would have no impact on water management
	<b>AOC1 Centenary House</b>	0	This policy would have no impact on water management
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	0	This policy would have no impact on water management
	<b>AOC3 Stagecoach, Marine Parade</b>	+	Parts of the site lie within Flood Zone 2 and Flood Zone 3. Therefore development in this location would place additional people at risk of flooding. Managing flood risks so that development is safe across its lifetime will have a positive impact on this objective.
	<b>AOC4 Worthing Leisure Centre</b>	+	The site is identified as having groundwater vulnerability (major) - the incorporation of SuDs as part of the redevelopment will have a positive impact on this objective.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	0	This policy would have no impact on water management
	<b>AOC6 Martlets Way</b>	0	This policy would have no impact on water management
	<b>OS1 Land east of Titnore Lane</b>	?	The site is identified as having groundwater vulnerability (medium) - the incorporation of SuDs as part of any potential redevelopment may have a positive impact on this objective.
	<b>OS2 Land north of Beeches Ave</b>	0	This policy would have no impact on water management
	<b>OS3 Worthing United Football Club</b>	0	This policy would have no impact on water management
	<b>CP1 Housing Mix &amp; Quality</b>	?	The requirement for all new build dwellings to meet requirement M4(2) accessible and adaptable dwellings includes as a requirement step free access, this may conflict with requirements for flood risk management and climate change adaptation.
<b>Part 4 Core Policies</b>	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	+	The policy requires proposals for new sites not to be located in an area of high flood risk (Flood Zone 3) reflecting the high vulnerability of these sites.
	<b>CP5 Quality of the Built Environment</b>	0	This policy will have no impact on this objective
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	/	The policy makes reference to mitigating the risks posed by flooding.
	<b>CP8 Open Space, Recreation and Leisure</b>	?	The provision of new open space could provide space for SuDS and flood storage
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective

	<b>CP10 Delivering Infrastructure</b>	+	The policy will ensure there is adequate water and flood management infrastructure.
	<b>CP11 Economic Growth and Skills</b>	0	This policy will have no impact on this objective
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	+	This policy includes a minimum standard for water efficiency.
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	+	Green infrastructure includes watercourses and SuDS therefore this may further support proposals for SuDS and Natural Flood Management as part of developments.
	<b>CP21 Flood Risk and Sustainable Drainage</b>	++	The policy aims to ensure flood risk is safely managed and opportunities taken to promote Sustainable Drainage Systems and reduce flooding.
	<b>CP22 Water Quality and Protection</b>	+	The policy ensures that there is no unacceptable impact on the potential yield of water resources which will help protect this important resource in an area of water stress.
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 6. Landscape and Character	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	+	The policy protects valued landscapes including important gaps between settlements and the undeveloped coastline
	<b>SP3 Development Sites</b>	?	It is unclear from this policy what the impact of these levels of development will be on landscape and character and the extent to which this can be mitigated.
	<b>SP4 Countryside and Undeveloped Coast</b>	+	This policy would preserve and protect the character of the countryside by preventing inappropriate development.
	<b>SP5 Local Gaps</b>	++	This policy would preserve and protect the character of local settlements by preventing coalescence
	<b>SP6 Local Green Space</b>	+	This policy protects important views that contribution to a sense of place on the Goring-Ferring Gao and Chatsmore Farm that are valued by the local community



<b>Part 3 Development Sites</b>	<b>A1 Caravan Club</b>	-	Development of this largely undeveloped site will have a negative impact on this objective.
	<b>A2 Land west of Fulbeck Ave</b>	-	Development of this undeveloped site will have an negative impact on this objective.
	<b>A3 Upper Brighton Road</b>	-	Development of this undeveloped site will have an negative impact on this objective.
	<b>A4 Decoy Farm</b>	-	Development of this undeveloped site will have an negative impact on this objective.
	<b>A5 Teville Gate</b>	0	This policy would have no impact on landscape and character.
	<b>A6 Union Place</b>	0	This policy would have no impact on landscape and character.
	<b>A7 Grafton</b>	0	This policy would have no impact on landscape and character.
	<b>A8 Civic Centre Car Park</b>	0	This policy would have no impact on landscape and character.
	<b>AOC1 Centenary House</b>	0	This policy would have no impact on landscape and character.
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	0	This policy would have no impact on landscape and character.
	<b>AOC3 Stagecoach, Marine Parade</b>	0	This policy would have no impact on landscape and character.
	<b>AOC4 Worthing Leisure Centre</b>	0	This policy would have no impact on landscape and character.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	0	This policy would have no impact on landscape and character.
	<b>AOC6 Martlets Way</b>	0	This policy would have no impact on landscape and character.
	<b>OS1 Land east of Titnore Lane</b>	-	Development of this undeveloped site adjacent to the SDNP will have a negative impact on this objective.
	<b>OS2 Land north of Beeches Ave</b>	-	Development of this undeveloped site adjacent to the SDNP will have a negative impact on this objective.
	<b>OS3 Worthing United Football Club</b>	-	Development of this undeveloped site adjacent to the SDNP will have a negative impact on this objective.
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective
	<b>CP5 Quality of the Built Environment</b>	+	The policy requires that developments should respect and enhance the character of the site and the prevailing character of the area,
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	0	This policy will have no impact on this objective
	<b>CP8 Open Space, Recreation and Leisure</b>	+	Resisting the loss of existing open space will help preserve local character.
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective
	<b>CP10 Delivering Infrastructure</b>	?	Depending on the type and location of new infrastructure there may be the potential for it to impact on landscape and character

	<b>CP11 Economic Growth and Skills</b>	0	This policy will have no impact on this objective
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	+	The policy aims to conserve and enhance the historic environment including important views and relationships between settlements and landscapes/seascapes.
	<b>CP16 The Historic Environment</b>	+	This policy aims to protect views that are demonstrably important to local character.
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	+	The policy requires developments to be located appropriately and not cause an unacceptable impact on landscape character.
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 7. Built Environment	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	+	The policy requires the density of development to relate well to the surrounding uses and character of the area which should protect and enhance the character of local townscapes and help development integrate with their surrounding context
	<b>SP3 Development Sites</b>	0	There is no link between the levels of development and the promotion of good design.
	<b>SP4 Countryside and Undeveloped Coast</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>SP5 Local Gaps</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>SP6 Local Green Space</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design

Part 3 Development Sites	<b>A1 Caravan Club</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>A2 Land west of Fulbeck Ave</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>A3 Upper Brighton Road</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>A4 Decoy Farm</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>A5 Teville Gate</b>	+	Redevelopment will help to integrate the site with the surrounding area and will provide high quality public realm. This will have a positive impact on this objective.
	<b>A6 Union Place</b>	++	Delivery of a landmark development in the heart of the town centre will help to integrate the site with the surrounding area and will provide high quality public realm plus active frontages. This will have a positive impact on this objective.
	<b>A7 Grafton</b>	++	Redevelopment will help to integrate the site with the surrounding area, will seek to enhance heritage assets and will provide high quality public realm. This will have a positive impact on this objective.
	<b>A8 Civic Centre Car Park</b>	+	A high quality development that is sensitive to the surrounding Conservation Areas will help to integrate the site with the wider area. This will have a positive impact on this objective.
	<b>AOC1 Centenary House</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	+	A high quality development that helps to integrate the site with the wider area will have a positive impact on this objective.
	<b>AOC3 Stagecoach, Marine Parade</b>	+	A development that is sensitive to the surrounding Conservation Areas will help to integrate the site with the wider area. This will have a positive impact on this objective.
	<b>AOC4 Worthing Leisure Centre</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>AOC5 HMRC Offices, Barrington Rd</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>AOC6 Martlets Way</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>OS1 Land east of Titnore Lane</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>OS2 Land north of Beeches Ave</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
	<b>OS3 Worthing United Football Club</b>	0	This policy would have no impact on the quality of the townscape or securing high quality design
Part 4 Core Policies	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	+	Minimum densities should help development integrate with their surrounding townscape
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective

<b>CP5 Quality of the Built Environment</b>	++	This policy will strongly contribute to protecting the built character of the townscape and securing t high quality design
<b>CP6 Public Realm</b>	+	A well designed public realm will contribute to the quality of the built environment
<b>CP7 Healthy Communities</b>	+	The policy aims to provide an attractive environment through inclusive design layout and public realm design and improved access to green space which would support good design.
<b>CP8 Open Space, Recreation and Leisure</b>	+	Resisting the loss of existing open space and the provision of new open space could improve the quality of the built environment
<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective
<b>CP10 Delivering Infrastructure</b>	+	Some types of infrastructure such as public art may help support good design and a high quality built environment.
<b>CP11 Economic Growth and Skills</b>	0	This policy will have no impact on this objective
<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
<b>CP15 A Strategic Approach to the Historic Environment</b>	+	The historic environment contributes to the quality and character of the built environment. The policy aims to protect and enhance and seek improvements to listed buildings and buildings within conservation areas where their condition has deteriorated.
<b>CP16 The Historic Environment</b>	+	The policy promotes high quality design respecting its context and demonstrating a sense of place.
<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
<b>CP18 Energy</b>	0	This policy will have no impact on this objective
<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
<b>CP20 Green Infrastructure</b>	+	Incorporation of green infrastructure could improve the quality of developments and public realm.
<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 8. Historic Environment	
Part 2 Spatial Strategy	SP2 Spatial Strategy	0	Although this policy won't directly impact the historic environment, the development of individual sites may. This is addressed through other policies in the Plan.
	SP3 Development Sites	?	It is unclear from this policy what the impact of these levels of development will be on the historic environment, including heritage assets, and the extent to which this can be mitigated.
	SP4 Countryside and Undeveloped Coast	0	This policy would have no direct impact on the historic environment
	SP5 Local Gaps	+	This policy would preserve historic views between settlements.
	SP6 Local Green Space	+	This policy provides protection to the historic associations of the Goring-Ferring Gap, and the setting of Chatsmore Farm to the historic environment and South Downs National Park which are valued by the local community.
Part 3 Development Sites	A1 Caravan Club	0	This policy would have no direct impact on the historic environment
	A2 Land west of Fulbeck Ave	0	This policy would have no direct impact on the historic environment
	A3 Upper Brighton Road	0	This policy would have no direct impact on the historic environment
	A4 Decoy Farm	0	This policy would have no direct impact on the historic environment
	A5 Teville Gate	+	This policy would help in achieving the objective as it will ensure that nearby heritage assets are protected and enhanced.
	A6 Union Place	+	Positive effect – the option would help in achieving the objective as it will provide an attractive setting to the historic environment.
	A7 Grafton	+	This policy would help in achieving the objective as it will provide an attractive setting to the historic environment.
	A8 Civic Centre Car Park	0	This policy would have no direct impact on the historic environment
	AOC1 Centenary House	0	This policy would have no direct impact on the historic environment
	AOC2 British Gas Site, Lyndhurst Rd	0	This policy would have no direct impact on the historic environment
	AOC3 Stagecoach, Marine Parade	0	This policy would have no direct impact on the historic environment
	AOC4 Worthing Leisure Centre	0	This policy would have no direct impact on the historic environment
	AOC5 HMRC Offices, Barrington Rd	0	This policy would have no direct impact on the historic environment
	AOC6 Martlets Way	0	This policy would have no direct impact on the historic environment
	OS1 Land east of Titnore Lane	0	This policy would have no direct impact on the historic environment
	OS2 Land north of Beeches Ave	0	This policy would have no direct impact on the historic environment

Part 4 Core Policies	OS3 Worthing United Football Club	0	This policy would have no direct impact on the historic environment
	CP1 Housing Mix & Quality	0	This policy will have no impact on this objective
	CP2 Density	?	Higher densities may have the potential to adversely impact heritage assets, however the policy states that particular consideration should be given to any heritage assets in setting the optimum density of a development.
	CP3 Affordable Housing	0	This policy will have no impact on this objective
	CP4 Gypsy & Travellers and Travelling Showpeople	0	This policy will have no impact on this objective
	CP5 Quality of the Built Environment	?	Good quality design should enhance heritage assets and the historic environment however the policy doesn't specifically address this
	CP6 Public Realm	/	The policy states that proposals must ensure that public realm relates to the local and historic context.
	CP7 Healthy Communities	0	This policy will have no impact on this objective
	CP8 Open Space, Recreation and Leisure	+	Resisting the loss of certain parks would protect their historic associations
	CP9 Planning for Sustainable Communities / Community Facilities	0	This policy will have no impact on this objective
	CP10 Delivering Infrastructure	?	Depending on the type and location of new infrastructure there may be the potential for it to impact on the historic environment
	CP11 Economic Growth and Skills	0	This policy will have no impact on this objective
	CP12 Protecting and Enhancing Existing Employment Sites	0	This policy will have no impact on this objective
	CP13 The Visitor Economy	0	This policy will have no impact on this objective
	CP14 Retail Policies	0	This policy will have no impact on this objective
	CP15 A Strategic Approach to the Historic Environment	++	This policy will conserve and enhance the historic environment and character of Worthing.
	CP16 The Historic Environment	++	The policy seeks to protect designated and undesignated heritage assets.
	CP17 Sustainable Design	0	This policy will have no impact on this objective
	CP18 Energy	0	This policy will have no impact on this objective
	CP19 Biodiversity	0	This policy will have no impact on this objective
	CP20 Green Infrastructure	0	This policy will have no impact on this objective
	CP21 Flood Risk and Sustainable Drainage	0	This policy will have no impact on this objective
	CP22 Water Quality and Protection	0	This policy will have no impact on this objective
	CP23 Pollution	0	This policy will have no impact on this objective
	CP24 Transport and Connectivity	0	This policy will have no impact on this objective
	CP25 Digital Infrastructure	0	This policy will have no impact on this objective



Draft Local Plan		Objective 9. Healthy Lifestyles	
Part 2 Spatial Strategy	SP2 Spatial Strategy	+	The protection of valued open spaces and safeguarding of leisure uses will help promote opportunities for exercise and recreation supporting the health of local communities
	SP3 Development Sites	+	It is unclear what the overall impact of this policy will be on healthy lifestyles. However this policy does specify where some specific sites will be expected to provide some leisure uses and healthcare facilities.
	SP4 Countryside and Undeveloped Coast	+	This policy supports recreation uses and enhanced access for pedestrians, cyclists, equestrians and those with mobility difficulties
	SP5 Local Gaps	+	This policy would ensure open space is preserved between settlements
	SP6 Local Green Space	+	This policy protects the recreation and leisure facilities, tranquillity and offer of escape from the urban environment for relaxation and exercise provided by these sites that the local communities value, contributing to healthy lifestyles
Part 3 Development Sites	A1 Caravan Club	0	This policy would have no impact on healthy lifestyles.
	A2 Land west of Fulbeck Ave	0	This policy would have no impact on healthy lifestyles.
	A3 Upper Brighton Road	0	This policy would have no impact on healthy lifestyles.
	A4 Decoy Farm	0	This policy would have no impact on healthy lifestyles.
	A5 Teville Gate	0	This policy would have no impact on healthy lifestyles.
	A6 Union Place	0	This policy would have no impact on healthy lifestyles.
	A7 Grafton	0	This policy would have no impact on healthy lifestyles.
	A8 Civic Centre Car Park	0	This policy would have no impact on healthy lifestyles.
	AOC1 Centenary House	0	This policy would have no impact on healthy lifestyles.
	AOC2 British Gas Site, Lyndhurst Rd	0	This policy would have no impact on healthy lifestyles.
	AOC3 Stagecoach, Marine Parade	0	This policy would have no impact on healthy lifestyles.
	AOC4 Worthing Leisure Centre	0	This policy would have no impact on healthy lifestyles.
	AOC5 HMRC Offices, Barrington Rd	0	This policy would have no impact on healthy lifestyles.
	AOC6 Martlets Way	0	This policy would have no impact on healthy lifestyles.
	OS1 Land east of Titnore Lane	0	This policy would have no impact on healthy lifestyles.
	OS2 Land north of Beeches Ave	0	This policy would have no impact on healthy lifestyles.

	<b>OS3 Worthing United Football Club</b>	?	Redevelopment of this site would require the suitable relocation of the football club. At this stage, there is no certainty as to where the club would move to and whether this would be a similar or enhanced facility.
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	+	Ensuring housing is of a high quality and meets the needs of its occupants including older people and are accessible and adaptable will help support healthy lifestyles.
	<b>CP2 Density</b>	+	Adopting the minimum nationally described space standards and the Council's local standards for external space will help support healthy lifestyles
	<b>CP3 Affordable Housing</b>	+	This provision of affordable housing will help ensure those on the housing register are provided suitable accommodation.
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	/	The policy requires that sites are not located on contaminated land, new refuse/landfill sites, wastewater treatment works, and electricity pylons or be adversely affected by noise and odour to protect the health and wellbeing of residents.
	<b>CP5 Quality of the Built Environment</b>	/	The policy requires that developments should be adaptable to changing lifestyles, and not have an unacceptable impact on occupiers of adjacent properties; however it does not specifically aim to enhance or promote healthy lifestyles.
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	++	This policy will promote healthy lifestyles and reduce health inequalities recognising the wide range of factors that impact on health
	<b>CP8 Open Space, Recreation and Leisure</b>	++	Providing new sports facilities, open space and resisting the loss of existing will help provide opportunities for recreation, exercise and help support good physical and mental health.
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	+	The provision of health and social facilities will support people's health and wellbeing
	<b>CP10 Delivering Infrastructure</b>	+	Ensuring adequate infrastructure will help support healthy lifestyles through the provision of health infrastructure and reducing the impacts of pollution
	<b>CP11 Economic Growth and Skills</b>	+	Improving skills and training could enable local residents to gain better paid employment which could help improve their living conditions and diet.
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	+	The implementation of energy efficiency measures will reduce the cost and need to heat or cool properties resulting in healthier living environments.
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective



	<b>CP19 Biodiversity</b>	?	This policy seeks to protect and enhance biodiversity; this may indirectly protect and enhance open spaces which provide opportunities for recreation.
	<b>CP20 Green Infrastructure</b>	+	The creation of a green infrastructure network will join up open spaces and provide green corridors for people to enjoy for recreation.
	<b>CP21 Flood Risk and Sustainable Drainage</b>	+	Ensuring the risks of flooding are safely managed will mean new development is less likely to flood thereby reducing the associated health risks.
	<b>CP22 Water Quality and Protection</b>	+	This policy seeks to protect the public water supply and ensure there are adequate means of water supply, sufficient foul and surface water drainage, and adequate sewage treatment capacity which could help prevent pollution which may harm human health.
	<b>CP23 Pollution</b>	+	This policy will help protect human health from pollution or hazards.
	<b>CP24 Transport and Connectivity</b>	+	Encouraging travel by walking and cycling can help improve people's health and wellbeing
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 10. Crime and Public Safety	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	0	This policy won't directly impact on crime and public safety, however the development of individual sites may. This is addressed through other policies in the Plan.
	<b>SP3 Development Sites</b>	+	There is no link between the levels of development and the promotion of design to improve security and reduce fear of crime. However the requirement for many sites to provide a mix of uses may indirectly contribute to safer places.
	<b>SP4 Countryside and Undeveloped Coast</b>	0	This policy would have no impact on crime and public safety
	<b>SP5 Local Gaps</b>	0	This policy would have no impact on crime and public safety
	<b>SP6 Local Green Space</b>	0	This policy would have no impact on crime and public safety
	<b>A1 Caravan Club</b>	0	This policy would have no impact on crime and public safety
Part 3 Development Sites	<b>A2 Land west of Fulbeck Ave</b>	0	This policy would have no impact on crime and public safety
	<b>A3 Upper Brighton Road</b>	0	This policy would have no impact on crime and public safety
	<b>A4 Decoy Farm</b>	0	This policy would have no impact on crime and public safety
	<b>A5 Teville Gate</b>	+	This policy would have a positive effect on crime and public safety as redevelopment will provide high quality public realm with improved cycle and pedestrian links from the station to town centre.
	<b>A6 Union Place</b>	0	This policy would have no impact on crime and public safety
	<b>A7 Grafton</b>	0	This policy would have no impact on crime and public
		0	

Part 4 Core Policies			safety
	<b>A8 Civic Centre Car Park</b>	0	This policy would have no impact on crime and public safety
	<b>AOC1 Centenary House</b>	0	This policy would have no impact on crime and public safety
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	0	This policy would have no impact on crime and public safety
	<b>AOC3 Stagecoach, Marine Parade</b>	0	This policy would have no impact on crime and public safety
	<b>AOC4 Worthing Leisure Centre</b>	0	This policy would have no impact on crime and public safety
	<b>AOC5 HMRC Offices, Barrington Rd</b>	0	This policy would have no impact on crime and public safety
	<b>AOC6 Martlets Way</b>	0	This policy would have no impact on crime and public safety
	<b>OS1 Land east of Titnore Lane</b>	0	This policy would have no impact on crime and public safety
	<b>OS2 Land north of Beeches Ave</b>	0	This policy would have no impact on crime and public safety
	<b>OS3 Worthing United Football Club</b>	0	This policy would have no impact on crime and public safety
	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective
Part 4 Core Policies	<b>CP5 Quality of the Built Environment</b>	+	This policy requires that developments should incorporate the principles of securing safety and reducing crime through design to create a safe and secure environment.
	<b>CP6 Public Realm</b>	+	The policy states that proposals must ensure that the public realm is safe, accessible and inclusive
	<b>CP7 Healthy Communities</b>	/	The policy recognises crime as a contributor to poor health and aims to mitigate the risks associated with it.
	<b>CP8 Open Space, Recreation and Leisure</b>	?	It is unclear whether there would be an impact, open space can sometimes be associated with anti-social behaviour
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective
	<b>CP10 Delivering Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP11 Economic Growth and Skills</b>	+	Improving skills and training and providing additional local jobs may reduce local unemployment rates which could subsequently reduce local crime.
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective

	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 11. Housing	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	+	This policy promotes a variety of ways of managing development. It promotes housing delivery by seeking to increase the rate of housing delivery from small sites.
	<b>SP3 Development Sites</b>	+	The delivery of the amounts of new housing specified will go some way to meet local need. However it is acknowledged that the requirements of this policy fall short of meeting the full local housing need.
	<b>SP4 Countryside and Undeveloped Coast</b>	-	This policy would restrict delivery of housing in areas designated as countryside
	<b>SP5 Local Gaps</b>	--	This policy would restrict the delivery of housing on some of the remaining sites capable of providing significant numbers
	<b>SP6 Local Green Space</b>	--	This policy affords these sites a level of protection akin to green belt therefore restricting the ability of these sites to contribute to the delivery of housing
Part 3 Development Sites	<b>A1 Caravan Club</b>	++	The allocation of this site for housing would have a very positive effect in helping to meet this objective.
	<b>A2 Land west of Fulbeck Ave</b>	++	The allocation of this site for housing would have a very positive effect in helping to meet this objective.
	<b>A3 Upper Brighton Road</b>	++	The allocation of this site for housing would have a very positive effect in helping to meet this objective.
	<b>A4 Decoy Farm</b>	0	This site is not suitable for housing so the policy will have no impact on this objective.
	<b>A5 Teville Gate</b>	++	The allocation of this site for mixed-uses (including a significant level of housing) housing would have a very positive effect in helping to meet this objective.
	<b>A6 Union Place</b>	++	The allocation of this site for mixed-uses (including a significant level of housing) would have a very positive effect in helping to meet this objective.
	<b>A7 Grafton</b>	++	The allocation of this site for mixed-uses (including a significant level of housing) would have a very positive effect in helping to meet this objective.
	<b>A8 Civic Centre Car Park</b>	++	The allocation of this site for mixed-uses (including a level of housing) would have a very positive effect in helping to meet this objective.

	<b>AOC1 Centenary House</b>	++	The identification of this site for mixed-uses (including a level of housing) would have a very positive effect in helping to meet this objective.
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	++	The identification of this site for mixed-uses (including a level of housing) would have a very positive effect in helping to meet this objective.
	<b>AOC3 Stagecoach, Marine Parade</b>	++	The identification of this site for mixed-uses (including a level of housing) would have a very positive effect in helping to meet this objective.
	<b>AOC4 Worthing Leisure Centre</b>	?	At this stage it is unclear whether housing uses will form part of any future redevelopment of this site.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	++	The identification of this site for mixed-uses (including a level of housing) would have a very positive effect in helping to meet this objective.
	<b>AOC6 Martlets Way</b>	0	At this stage, this site being promoted for employment rather than residential uses so the policy will have no impact on this objective.
	<b>OS1 Land east of Titnore Lane</b>	?	At this stage it is unclear whether the identified constraints can be overcome and therefore whether there would be an impact on this housing objective.
	<b>OS2 Land north of Beeches Ave</b>	?	At this stage it is unclear whether the identified constraints can be overcome and therefore whether there would be an impact on this housing objective.
	<b>OS3 Worthing United Football Club</b>	?	At this stage it is unclear whether the identified constraints can be overcome and therefore whether there would be an impact on this housing objective.
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	++	Will ensure a range of dwelling types, tenures and sizes are provided that reflect and respond to housing needs and demands.
	<b>CP2 Density</b>	++	This policy will help ensure the most efficient use of land is made maximising the delivery of housing.
	<b>CP3 Affordable Housing</b>	++	This policy will ensure that on sites of a sufficient size a proportion of affordable housing is provided to help meet local needs.
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	+	This policy will help meet the identified need of this particular group
	<b>CP5 Quality of the Built Environment</b>	/	The policy will ensure that new housing is well designed but won't specifically support delivery of housing or assist in meeting local housing needs.
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	+	The policy recognises the importance in providing high quality homes in supporting mental health
	<b>CP8 Open Space, Recreation and Leisure</b>	-	The need to provide new open space could restrict the amount of housing that can be delivered on a development site.
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective
	<b>CP10 Delivering Infrastructure</b>	+	Adequate infrastructure provided in a timely manner will support and enable the delivery of new housing
	<b>CP11 Economic Growth and Skills</b>	+	Improving skills and training could enable local residents to gain better paid employment which could help improve access to better quality housing

	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 12. Communities	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	+	The policy safeguards community facilities
	<b>SP3 Development Sites</b>	?	It is unclear what the impact of the levels of development specified in this policy will be on local communities. The infrastructure required to support development is outlined elsewhere in the Plan as are policies that promote well designed and inclusive public spaces.
	<b>SP4 Countryside and Undeveloped Coast</b>	0	This policy would have no impact on communities
	<b>SP5 Local Gaps</b>	+	This policy would help retain the identity of communities located on the edge of the town.
	<b>SP6 Local Green Space</b>	++	This policy protects individual sites identified by the local community of being of particular importance to them for a wide range of reasons.
Part 3 Development Sites	<b>A1 Caravan Club</b>	0	This policy would have no direct impact on communities
	<b>A2 Land west of Fulbeck Ave</b>	0	This policy would have no direct impact on communities
	<b>A3 Upper Brighton Road</b>	0	This policy would have no direct impact on communities
	<b>A4 Decoy Farm</b>	0	This policy would have no direct impact on communities
	<b>A5 Teville Gate</b>	0	This policy would have no direct impact on communities
	<b>A6 Union Place</b>	0	This policy would have no direct impact on communities
	<b>A7 Grafton</b>	0	This policy would have no direct impact on communities
	<b>A8 Civic Centre Car Park</b>	++	The provision of a new health hub will have a very positive impact on this objective.

	<b>AOC1 Centenary House</b>	+	The community led redevelopment of this site will have a positive impact on this objective.
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	0	This policy would have no direct impact on communities
	<b>AOC3 Stagecoach, Marine Parade</b>	0	This policy would have no direct impact on communities
	<b>AOC4 Worthing Leisure Centre</b>	++	The provision of a new sports centre and community facilities will have a very positive impact on this objective.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	0	This policy would have no direct impact on communities
	<b>AOC6 Martlets Way</b>	0	This policy would have no direct impact on communities
	<b>OS1 Land east of Titnore Lane</b>	0	This policy would have no direct impact on communities
	<b>OS2 Land north of Beeches Ave</b>	0	This policy would have no direct impact on communities
	<b>OS3 Worthing United Football Club</b>	?	It is unclear at this stage what any future development would mean to the existing community facility.
	<b>CP1 Housing Mix &amp; Quality</b>	+	Will help meet the needs of everyone in the community.
<b>Part 4 Core Policies</b>	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	/	This policy states that proposals for sites should not have an adverse impact on the amenities of both residents of the site and occupiers of nearby properties. it also requires that the site should be well related to local services and community facilities.
	<b>CP5 Quality of the Built Environment</b>	0	This policy will have no impact on this objective
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	+	The policy aims to provide social connections through inclusive design and increasing opportunities for communal food growing spaces including allotments.
	<b>CP8 Open Space, Recreation and Leisure</b>	+	Resisting the loss of existing open space or sports facilities will help maintain these important local resources for communities.
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	+	The policy protects and supports improvements to a range of community facilities where they meet the needs of local communities.
	<b>CP10 Delivering Infrastructure</b>	+	The policy will ensure that additional demands from development on local services and facilities will be provided for minimising the impact on local communities
	<b>CP11 Economic Growth and Skills</b>	+	This policy aims to address local skills shortage and support skills development and training which may improve job opportunities for local communities.
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	+	This policy supports the role of district and local centres in meeting the day to day needs of residents and contributing to social inclusion.



	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	+	The introduction of water and energy efficiency measures will make properties cheaper to run, benefiting those people on lower incomes.
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	+	This policy supports the provision of high quality digital infrastructure which can help enhance the provision of and access to community facilities and services

Draft Local Plan		Objective 13. Education	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	/	This policy doesn't specifically address education; however the promotion of new development may result in the need for new or expanded facilities. The policy does seek to balance the impact of growth through the protection and enhancement of local services.
	<b>SP3 Development Sites</b>	?	It is unclear what the impact of the levels of development specified in this policy will be on the provision of and accessibility to education facilities and skills or training facilities.
	<b>SP4 Countryside and Undeveloped Coast</b>	0	This policy would have no impact on education facilities
	<b>SP5 Local Gaps</b>	0	This policy would have no impact on education facilities
	<b>SP6 Local Green Space</b>	0	This policy would have no impact on education facilities
Part 3 Development Sites	<b>A1 Caravan Club</b>	0	This policy would have no direct impact on education
	<b>A2 Land west of Fulbeck Ave</b>	0	This policy would have no direct impact on education
	<b>A3 Upper Brighton Road</b>	0	This policy would have no direct impact on education
	<b>A4 Decoy Farm</b>	0	This policy would have no direct impact on education
	<b>A5 Teville Gate</b>	0	This policy would have no direct impact on education
	<b>A6 Union Place</b>	0	This policy would have no direct impact on education
	<b>A7 Grafton</b>	0	This policy would have no direct impact on education
	<b>A8 Civic Centre Car Park</b>	0	This policy would have no direct impact on education
	<b>AOC1 Centenary House</b>	0	This policy would have no direct impact on education
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	0	This policy would have no direct impact on education
	<b>AOC3 Stagecoach, Marine Parade</b>	0	This policy would have no direct impact on education

	<b>AOC4 Worthing Leisure Centre</b>	0	This policy would have no direct impact on education
	<b>AOC5 HMRC Offices, Barrington Rd</b>	0	This policy would have no direct impact on education
	<b>AOC6 Martlets Way</b>	0	This policy would have no direct impact on education
	<b>OS1 Land east of Titnore Lane</b>	0	This policy would have no direct impact on education
	<b>OS2 Land north of Beeches Ave</b>	0	This policy would have no direct impact on education
	<b>OS3 Worthing United Football Club</b>	0	This policy would have no direct impact on education
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective
	<b>CP5 Quality of the Built Environment</b>	0	This policy will have no impact on this objective
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	0	This policy will have no impact on this objective
	<b>CP8 Open Space, Recreation and Leisure</b>	0	This policy will have no impact on this objective
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	+	The policy protects and supports improvements to existing education facilities and states that the Council will work with service providers to deliver appropriate facilities in accessible locations.
	<b>CP10 Delivering Infrastructure</b>	+	The policy will support the provision of new education facilities to meet the needs of the local population.
	<b>CP11 Economic Growth and Skills</b>	+	This policy aims to support skills development and training which would have strong links with local education facilities.
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	0	This policy will have no impact on this objective
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	0	This policy will have no impact on this objective
	<b>CP15 A Strategic Approach to the Historic Environment</b>	?	The policy aims to encourage the best use of heritage assets in education. However it is unclear what the impact of this would be.
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective



Draft Local Plan		Objective 14. Economy	
Part 2 Spatial Strategy	SP2 Spatial Strategy	/	This policy seeks to safeguard existing employment sites. Therefore although it may contribute to sustaining the local economy it won't provide space for new businesses or the expansion of existing.
	SP3 Development Sites	+	The levels of development specified in this policy include an indicative minimum amount of employment floorspace to support economic growth
	SP4 Countryside and Undeveloped Coast	-	This policy would restrict economic development within areas designated as countryside
	SP5 Local Gaps	-	This policy would restrict development including potential new employment floorspace on sites within Local Gaps
	SP6 Local Green Space	-	This policy restricts the types of development that would be considered appropriate on these sites including economic development
Part 3 Development Sites	A1 Caravan Club	/	Although the development of this site will reduce the area of the caravan club the policy seeks to protect and enhance the continued use of the northern part of the site as a Caravan Club.
	A2 Land west of Fulbeck Ave	0	The delivery of housing will provide employment opportunities in the short term. However, this policy would have no direct impact on the economy in the long term.
	A3 Upper Brighton Road	0	The delivery of housing will provide employment opportunities in the short term. However, this policy would have no direct impact on the economy in the long term.
	A4 Decoy Farm	++	The delivery of new commercial floorspace will have a very positive impact on this objective.
	A5 Teville Gate	++	The delivery of new commercial floorspace along with the provision of good infrastructure to promote economic growth will have a very positive impact on this objective.
	A6 Union Place	++	The delivery of new commercial floorspace along with improved public realm and accessibility will have a very positive impact on this objective.
	A7 Grafton	++	The delivery of new commercial floorspace along with improved public realm and accessibility will have a very positive impact on this objective.
	A8 Civic Centre Car Park	+	The delivery of a new health hub will have a positive impact on this objective.
	AOC1 Centenary House	+	The delivery of new / improved community and commercial uses will have a positive impact on this objective.
	AOC2 British Gas Site, Lyndhurst Rd	?	At this stage it is unclear whether the site will deliver a level of employment opportunities so it is uncertain what impact it will have on this objective.
	AOC3 Stagecoach, Marine Parade	+	The delivery of new leisure / cultural and commercial uses will have a positive impact on this objective.
	AOC4 Worthing Leisure Centre	?	At this stage it is unclear whether the site will deliver a level of employment opportunities so it is uncertain

			what impact it will have on this objective.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	/	Although the mixed-use redevelopment of this site will result in a reduction in the area covered by employment uses the policy will help to ensure that new employment uses are delivered that better meet the needs of modern businesses.
	<b>AOC6 Martlets Way</b>	++	The delivery of new commercial floorspace along with improved accessibility will have a very positive impact on this objective.
	<b>OS1 Land east of Titnore Lane</b>	0	The possible delivery of housing will provide employment opportunities in the short term. However, this policy would have no direct impact on the economy in the long term.
	<b>OS2 Land north of Beeches Ave</b>	-	The possible delivery of housing will provide employment opportunities in the short term. However, this policy would have no direct impact on the economy in the long term and redevelopment would be likely to require the removal / relocation of the existing car repairers.
	<b>OS3 Worthing United Football Club</b>	0	The possible delivery of housing will provide employment opportunities in the short term. However, this policy would have no direct impact on the economy in the long term.
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective
	<b>CP5 Quality of the Built Environment</b>	0	This policy will have no impact on this objective
	<b>CP6 Public Realm</b>	0	This policy will have no impact on this objective
	<b>CP7 Healthy Communities</b>	+	The policy recognises the link between income and health and aims to improve provision and / or access to employment.
	<b>CP8 Open Space, Recreation and Leisure</b>	0	This policy will have no impact on this objective
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	+	Protecting and providing new community facilities and services could provide additional local jobs and help support the local workforce.
	<b>CP10 Delivering Infrastructure</b>	+	Ensuring the necessary infrastructure is in place will help support the local economy.
	<b>CP11 Economic Growth and Skills</b>	++	The policy seeks to promote economic development to enable the continued development of a strong sustainable and local economy
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	+	The policy approach of protected employment areas will help prevent a loss of floorspace to other uses, supporting the local economy through the provision of jobs
	<b>CP13 The Visitor Economy</b>	+	The policy intends to extend the tourist season and maintain tourism facilities and accommodation. This will support tourism which is of significant importance to Worthing's local economy.

	<b>CP14 Retail Policies</b>	+	Supporting the vitality and viability of Worthing's town centres will support the tourism offer and benefit the local economy
	<b>CP15 A Strategic Approach to the Historic Environment</b>	+	The cultural offer is an important attraction for visitors, Ensuring the historic environment is protected and enhanced to a high quality will help support the tourism sector of the local economy.
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	0	This policy will have no impact on this objective
	<b>CP25 Digital Infrastructure</b>	+	This policy supports the provision of high quality digital infrastructure which can help support local economic growth.

Draft Local Plan		Objective 15. Town and Local Centres	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	+	The policy states that the local plan will help to deliver wider regeneration objectives particularly in the town centre and seafront which will help support the vitality and viability of the town centre.
	<b>SP3 Development Sites</b>	+	The levels of development specified in this policy include an indicative minimum amount of commercial (retail and leisure) floorspace to be provided which will support the vitality and viability of the town centre.
	<b>SP4 Countryside and Undeveloped Coast</b>	0	This policy would have no impact on town or local centres
	<b>SP5 Local Gaps</b>	0	This policy would have no impact on town or local centres
	<b>SP6 Local Green Space</b>	0	This policy would have no impact on town or local centres
Part 3 Development Sites	<b>A1 Caravan Club</b>	0	This policy would have no impact on town or local centres
	<b>A2 Land west of Fulbeck Ave</b>	0	This policy would have no impact on town or local centres
	<b>A3 Upper Brighton Road</b>	0	This policy would have no impact on town or local centres
	<b>A4 Decoy Farm</b>	0	This policy would have no impact on town or local centres
	<b>A5 Teville Gate</b>	+	This policy would have a positive effect as improved connectivity between the station and town centre will help to meet this objective

	<b>A6 Union Place</b>	++	This policy would have a very positive impact as it will create a landmark mixed use development in the heart of the town centre. Improved public realm and the introduction of live frontages will help to meet this objective.
	<b>A7 Grafton</b>	++	This policy would have a very positive impact as it will facilitate regeneration through the creation of a high quality mixed use development that will help to create an improved link between the town centre and seafront. This will help to meet this objective.
	<b>A8 Civic Centre Car Park</b>	0	This policy would have no impact on town or local centres
	<b>AOC1 Centenary House</b>	0	This policy would have no impact on town or local centres
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	+	This policy would have a positive effect as redevelopment enhanced linkages will help to support the local centre in close proximity of this site.
	<b>AOC3 Stagecoach, Marine Parade</b>	++	This policy would have a very positive impact as regeneration will deliver a mixed use development in the heart of the town centre. Enhanced permeability and improved access will help to meet this objective.
	<b>AOC4 Worthing Leisure Centre</b>	+	This policy would have a positive effect as redevelopment and intensification of uses will help to support the local centre in close proximity of this site.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	+	This policy would have a positive effect as redevelopment and intensification of uses will help to support the local centre in close proximity of this site.
	<b>AOC6 Martlets Way</b>	0	This policy would have no impact on town or local centres
	<b>OS1 Land east of Titnore Lane</b>	0	This policy would have no impact on town or local centres
	<b>OS2 Land north of Beeches Ave</b>	0	This policy would have no impact on town or local centres
	<b>OS3 Worthing United Football Club</b>	0	This policy would have no impact on town or local centres
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	0	This policy will have no impact on this objective
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	0	This policy will have no impact on this objective
	<b>CP5 Quality of the Built Environment</b>	0	This policy will have no impact on this objective
	<b>CP6 Public Realm</b>	+	An enhanced public realm in the town centre is identified within the policy as an integral part of the strategic objectives for the town.
	<b>CP7 Healthy Communities</b>	0	This policy will have no impact on this objective
	<b>CP8 Open Space, Recreation and Leisure</b>	0	This policy will have no impact on this objective
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	0	This policy will have no impact on this objective

	<b>CP10 Delivering Infrastructure</b>	+	The provision of new infrastructure could help support the vitality and viability of Local Centres, especially in terms of health facilities. In addition adequate or improved public transport infrastructure could help people to access the town centre, increasing visitor numbers.
	<b>CP11 Economic Growth and Skills</b>	+	The policy promotes a town centre first approach to new office space and supports the development of tourism, leisure, sporting and creative industries particularly in the town centre.
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	+	A number of protected key office locations are located within or near to the Town Centre these will help maintain visitor numbers within the Town Centre supporting its vibrancy
	<b>CP13 The Visitor Economy</b>	+	Supporting the tourism sector will benefit the town centre by increasing visitor numbers and improving wider town centre uses such as theatres and other cultural uses.
	<b>CP14 Retail Policies</b>	++	Protecting and enhancing the hierarchy of Worthing's town centres and seeking to meet the identified floorspace needs for retail and other town uses will support the vitality and viability of the town centre, district and local centres.
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	0	This policy will have no impact on this objective
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	+	This policy aims to ensure new development is located in sustainable locations with good access to shops and key services which will help support the town and local centres.
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

Draft Local Plan		Objective 16. Travel and Access	
Part 2 Spatial Strategy	<b>SP2 Spatial Strategy</b>	?	It is unclear what the impact of this policy will have on access to sustainable modes of transport.
	<b>SP3 Development Sites</b>	?	It is unclear what the levels of development specified in this policy will have on access to sustainable modes of transport.
	<b>SP4 Countryside and Undeveloped Coast</b>	+	This policy would enhance pedestrian, cycle and equestrian access
	<b>SP5 Local Gaps</b>	0	This policy would have no impact on access to sustainable modes of transport.

	<b>SP6 Local Green Space</b>	0	This policy would have no impact on access to sustainable modes of transport.
<b>Part 3 Development Sites</b>	<b>A1 Caravan Club</b>	+	This policy would enhance pedestrian access through the provision of a new footway adjacent to the southern boundary.
	<b>A2 Land west of Fulbeck Ave</b>	0	This policy would have no impact on access to sustainable modes of transport.
	<b>A3 Upper Brighton Road</b>	+	The enhancement of footpath (3135) will help to enhance pedestrian access and help to achieve the objective.
	<b>A4 Decoy Farm</b>	0	This policy would have no impact on access to sustainable modes of transport.
	<b>A5 Teville Gate</b>	+	The provision of high quality public realm with cycle and pedestrian links from the station to the town centre will enhance pedestrian and cycle access.
	<b>A6 Union Place</b>	?	At this stage it is unclear what impact the development will have on access to sustainable modes of transport.
	<b>A7 Grafton</b>	+	A new route from the seafront to the primary shopping area would enhance pedestrian access.
	<b>A8 Civic Centre Car Park</b>	0	This policy would have no impact on access to sustainable modes of transport.
	<b>AOC1 Centenary House</b>	0	This policy would have no impact on access to sustainable modes of transport.
	<b>AOC2 British Gas Site, Lyndhurst Rd</b>	+	The provision of an attractive and accessible pedestrian link to the High Street will encourage greater movement by sustainable means.
	<b>AOC3 Stagecoach, Marine Parade</b>	0	This policy would have no impact on access to sustainable modes of transport.
	<b>AOC4 Worthing Leisure Centre</b>	0	This policy would have no impact on access to sustainable modes of transport.
	<b>AOC5 HMRC Offices, Barrington Rd</b>	+	An improved access to Durrington station will encourage greater movement by rail.
	<b>AOC6 Martlets Way</b>	+	The promotion of a travel plan to improve the accessibility and sustainability of the site will help to meet this objective.
	<b>OS1 Land east of Titnore Lane</b>	?	At this stage it is unclear what impact the development will have on access to sustainable modes of transport.
	<b>OS2 Land north of Beeches Ave</b>	?	At this stage it is unclear what impact the development will have on access to sustainable modes of transport.
	<b>OS3 Worthing United Football Club</b>	?	At this stage it is unclear what impact the development will have on access to sustainable modes of transport.
<b>Part 4 Core Policies</b>	<b>CP1 Housing Mix &amp; Quality</b>	0	This policy will have no impact on this objective
	<b>CP2 Density</b>	+	This policy recommends a higher minimum density near public transport hubs
	<b>CP3 Affordable Housing</b>	0	This policy will have no impact on this objective
	<b>CP4 Gypsy &amp; Travellers and Travelling Showpeople</b>	+	This policy requires proposals for sites to be located in a way that local services and facilities can be accessed by foot, cycle, and public transport as well as by car.



	<b>CP5 Quality of the Built Environment</b>	+	This policy states that all new development should include a layout and design that create safe conditions for access, egress and active travel between all locations and provide good links to integrated public transport.
	<b>CP6 Public Realm</b>	+	Policy encourages opportunities to improve the public realm through integrated sustainable transport schemes.
	<b>CP7 Healthy Communities</b>	+	The policy seeks improvements in the enhancement and accessibility of safe active travel routes to enable exercise and physical activity as part of everyday life.
	<b>CP8 Open Space, Recreation and Leisure</b>	+	Open space can help support routes for active travel such as walking and cycling
	<b>CP9 Planning for Sustainable Communities / Community Facilities</b>	+	Community facilities and services that are located locally to the communities they serve could help reduce the need to travel.
	<b>CP10 Delivering Infrastructure</b>	+	Ensuring the necessary infrastructure is in place could help improve access to public transport.
	<b>CP11 Economic Growth and Skills</b>	+	The policy supports the improvement of digital infrastructure which may reduce the need for people to travel. In addition improving the likelihood of local employment could reduce the need to commute either through new jobs being provided locally or by reducing any skill shortages.
	<b>CP12 Protecting and Enhancing Existing Employment Sites</b>	+	The policy approach of protected employment areas will help ensure there is a steady supply of jobs within the local area, reducing the need for commuting.
	<b>CP13 The Visitor Economy</b>	0	This policy will have no impact on this objective
	<b>CP14 Retail Policies</b>	+	Protecting and enhancing the hierarchy of town centres will enable local residents' better access to goods and services without the need to travel.
	<b>CP15 A Strategic Approach to the Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP16 The Historic Environment</b>	0	This policy will have no impact on this objective
	<b>CP17 Sustainable Design</b>	0	This policy will have no impact on this objective
	<b>CP18 Energy</b>	0	This policy will have no impact on this objective
	<b>CP19 Biodiversity</b>	0	This policy will have no impact on this objective
	<b>CP20 Green Infrastructure</b>	+	The creation of an integrated network of green infrastructure may indirectly create new routes for active travel.
	<b>CP21 Flood Risk and Sustainable Drainage</b>	0	This policy will have no impact on this objective
	<b>CP22 Water Quality and Protection</b>	0	This policy will have no impact on this objective
	<b>CP23 Pollution</b>	0	This policy will have no impact on this objective
	<b>CP24 Transport and Connectivity</b>	++	This policy aims to achieve a rebalancing of transport in favour of sustainable modes.
	<b>CP25 Digital Infrastructure</b>	0	This policy will have no impact on this objective

## **APPENDIX E: HABITATS REGULATIONS ASSESSMENT SCREENING**

### **Introduction**

This report has been prepared as part of the Habitats Regulations Assessment (HRA) for the draft Worthing Local Plan 2016 - 2033 (WLP). The report accompanies publication of the Regulation 18 Worthing Local Plan and forms part of the evidence upon which it is based.

The purpose of this report is to provide an initial screening stage assessment as to whether there might be any aspects of the emerging Worthing Local Plan that would have the potential to cause a likely significant effect on internationally important wildlife sites either in isolation or in combination with other plans and projects, and to establish whether a full Habitat Regulations Assessment is required of the Worthing Local Plan.

In addition, the Council has prepared a draft Sustainability Appraisal report (that incorporates the requirements of the Strategic Environmental Assessment Directive) referred to as an Integrated Impact Assessment as it also incorporates a Health and Equality Impact Assessment. The draft Sustainability Appraisal is informed by a Scoping Report which outlines the relevant environmental baseline data. It is recommended that this screening statement is read in conjunction with the Draft Integrated Impact Assessment Report

### **Draft Worthing Local Plan**

The Draft Local Plan will set the planning strategy for the borough and address housing and employment needs up until 2033. The plan sets out proposed strategic and development management policies, development allocations and actions to meet the environmental, social and economic challenges facing the borough. The area covered by the Local Plan is the part of the borough that is located outside of the South Downs National Park. When adopted, the Local Plan will provide a strategy for the distribution, scale and form of development and supporting infrastructure, a set of proposals to deliver the strategy, policies against which to assess planning applications, and proposals for monitoring the successful implementation of the plan. Once adopted, the Local Plan will replace the existing Worthing Core Strategy (2011) and saved policies.

### **Habitats Regulations Assessment**

The European Union (EU) Habitats Directive protects certain species of plants and animals which are particularly vulnerable.

The Conservation of Habitats and Species Regulations 2017 (as amended), commonly referred to as the 'Habitats Regulations' transpose two pieces of European law – Directive 2009/147/EC on the conservation of wild birds (the Birds Directive) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna (the Habitats Directive) – into domestic law.

Article 6(3) of the Habitats Directive sets out:

*“Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*

The sites covered by this legislation include Special Protection Areas (SPAs) classified under the EU Birds Directive and Special Areas of Conservation (SACs), designated under the EU Habitats Directive, European Offshore Marine Sites (EMS) and sites on the Ramsar List of Wetlands of International Importance, also known as Natura 2000 sites.



A number of areas of internationally important wetland habitat are recognised under the Ramsar Convention. Ramsar sites are listed for particular wetland habitats and, in the UK, overlap SPA classifications and SAC designations. The criteria for listing a site as a Ramsar site are different to those used for SPAs and SACs, but the Ramsar criteria are of equal importance for the ecological functioning and integrity of the relevant site. National guidance requires that Ramsar sites are also assessed within HRA of plans.

The Revised National Planning Policy Framework (2018) recognises that protection should also be afforded to 'Potential' or 'Possible' SACs (pSACs), 'Candidate' SACs (cSACs) and 'Potential' SPAs (pSPAs) (i.e. sites that have yet to be formally classified as SPAs or designated as SACs but are proposed as such) are also considered as European sites. However, there are no such pSACs, cSACs or pSPAs within or adjacent to Worthing Borough.

### **Habitat Regulations Assessment Screening**

The first stage of the HRA process involves an assessment or screening of whether the Plan is likely to have a significant effect on one or more European sites either alone or in combination. The objective is to 'screen out' those plans and projects that can, without detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites.

If it can be demonstrated that likely significant effects will not occur, no further assessment is required. That is the purpose of this report. If significant effects cannot be ruled out as unlikely, these impacts would be considered further in an Appropriate Assessment and avoidance and mitigation approaches recommended.

The recent Sweetman II / People Over Wind European Court of Justice ruling has determined that, contrary to earlier UK court judgements, mitigation measures should not be taken into account in assessing likely significant effects. Mitigation should instead only be taken into account at the 'appropriate assessment stage'. Appropriate assessment is not a technical term; it simply means 'an assessment that is appropriate' for the plan or project in question. This screening is a screening for likely significant effects, and therefore, in accordance with the judgement, does not take into account any potential mitigation.

#### *Screening Methodology*

The Habitat Regulations do not prescribe a particular methodology for carrying out the assessment of plans, or how to report the outcomes of such assessments. The process of HRA is based on the application of the precautionary principle and therefore requires those undertaking the exercise to demonstrate that the plan will not have a significant impact on the European Site's conservation objectives. Evidence should be presented to allow a determination of whether the impacts of a land use plan against the conservation objectives of a European Site would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse impacts should be assumed.

Table 1 sets out the steps involved in screening a Habitat Regulations Assessment

<b>Step</b>	<b>Action</b>
1.	Make a decision as to whether there is any mechanism by which the plan can affect any European site by altering its environmental conditions, focussing on those sites within the administrative boundary or which may be linked to development within the boundary by a pathway
2.	Determine the reasons for the European designation of these sites.
3.	Explore the environmental conditions required to maintain the integrity of the selected sites and become familiar with the current trends in these environmental processes.

4.	Gain a full understanding of the plan and its policies and consider each policy within the context of the environmental processes – could the policy lead to an impact on any identified process?
5.	Decide if the identified impact is likely to lead to a significant effect.
6.	Identify other plans and projects that might affect these sites in combination with the Plan and decide whether there is likely to be a significant effect “in combination”. In practice ‘in combination’ assessments are only really necessary if the plan element in question has been screened out when considered in isolation.
7.	If Likely Significant Effects have been identified, the HRA must progress to AA Task 2 (Appropriate Assessment), which will involve consideration of mitigation and avoidance measures.

### Impact Pathway Screening

This stage considers those European sites that could potentially be affected by Worthing Local Plan through a known ‘pathway’ i.e. the site could be linked to development proposed within the Local Plan and therefore a change of activity arising from development could affect the site. However, this has to be proportionate to the geographical scope of the Plan area. The map at the end of this document shows the location of relevant European Sites.

There are no European sites that lie wholly or partly within the Worthing borough.

The relevant European sites within a 15km radius from Worthing's boundary are:

- a) Arun Valley SPA (in Horsham District Council)
- b) Duncton and Bignor Escarpment SAC (in Chichester District Council)

In addition, Castle Hill SAC lies over 20km away. Whilst it is of some distance from the borough boundary, for completeness purposes, it is considered appropriate to assess the site.

Also, Ashdown Forest SAC and SPA lies over 35km away. Given that Ashdown Forest has become increasingly sensitive due to increased recreation activities and air quality impacts and the recent high court judgement, it is also appropriate to assess this site.

The following section provides a brief overview of the sites and identifies particular vulnerabilities.

#### *a) Arun Valley SPA – Special Protection Area for Birds*

The Arun Valley SPA and Ramsar consists of three component Sites of Special Scientific Interest: Amberley Wild Brooks SSSI, Pulborough Brooks SSSI and Waltham Brooks SSSI. Together these sites comprise an area of wet meadows on the floodplain of the River Arun between Pulborough and Amberley.

The area is designated as an SPA under the Birds Directive to be an SPA as it is an internationally important area for 20,000+ waterfowl including wintering population of tundra swan. Used regularly by more than 1% of GB's population of Annex I species Bewick's swan (*Cygnus columbianus bewickii*). The neutral wet grassland ditches support rich aquatic flora and invertebrate fauna. The area is of outstanding ornithological importance notably for wintering wildfowl and breeding waders.

The Arun Valley in West Sussex is located just north of the South Downs escarpment about 15 km inland from the south coast of England. It consists of low-lying grazing marsh, largely on alluvial soils, but with an area of peat derived from a relict raised bog. Variation in soils and water supply lead to a wide range of ecological conditions and hence a rich flora and fauna. Southern parts of the Arun Valley are fed by calcareous springs, while to the north, where the underlying geology is Greensand, the water is more acidic. The history of management of fields, and their water levels, determines the

plant communities present, with drier fields dominated by meadow grasses, Crested Dog's-tail *Cynosurus cristatus* and Perennial Rye-grass *Lolium perenne*. In wetter areas, rushes, sedges and Tufted Hair-grass *Deschampsia cespitosa* are more frequent. Ungrazed fields have developed into fen, scrub or woodland. Fen areas consist of Common Reed *Phragmites australis*, Reed Sweet-grass *Glyceria maxima* and Greater Tussock-sedge *Carex paniculata*, often with scattered elder *Sambucus* sp. and willow scrub. On firmer ground, there is Alder *Alnus glutinosa*, Willow *Salix* sp., Birch *Betula* sp., and willow, with Oak *Quercus robur* and Hazel *Corylus avellana* woodland on the driest ground. The ditches and margins between grazing marsh fields have an outstanding aquatic flora and invertebrate fauna. The Arun Valley supports important numbers of wintering waterbirds, which feed in the wetter, low-lying fields and along ditches.

#### *b) Duncton and Bignor Escarpment – Special Area of Conservation*

Asperulo-Fagetum beech forests occur here on steep scarp slopes and on more gently-sloping hillsides in mosaic with ash *Fraxinus excelsior* woodland, scrub and grassland. Much of the beech woodland is high forest but with some old pollards. Rare plants present include the white helleborine *Cephalanthera damasonium*, yellow bird's nest *Monotropa hypopitys* and green hellebore *Helleborus viridis*. The woods also have a rich mollusc fauna.

#### *Castle Hill SAC - Special Area of Conservation*

This site comprises of semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*). The site hosts the priority habitat type "orchid rich sites". Chalk grassland with a mosaic of calcareous semi-natural dry grassland communities. Important assemblage of rare and scarce species including early spider orchid (*Ophrys sphegodes*) (one of the largest colonies in the UK), burnt orchid (*Orchis ustulata*) and early gentian (*Gentianella anglica*).

#### *Ashdown Forest SAC, SPA & SSSI*

Ashdown Forest is one of the largest single continuous blocks of lowland heath (both dry and wet heath) in South East England. The site was designated in 2005 for a number of reasons, including the SAC's extensive areas of lowland heath, which is vulnerable to nitrogen dioxide pollution from motor vehicles. The SAC covers 2,729 hectares which lies wholly within Wealden District Council with two major roads passing through or close to the SAC (A22 and the A26). Any new development may have an effect on the SAC with regards to an increase in traffic that may result from such development. This is on the basis that excess nitrogen or an increase in nitrogen from more cars on the road or an increase in car journeys across the forest may result in damage to the protected species or a net decrease of species or habitat cover.

A recent high court judgement *Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* [2017] EWHC 351 (Admin) saw part of Lewes Joint Core Strategy being quashed. The challenge was on the basis that neighbouring authorities Lewes District Council and South Downs National Park Authority had acted unlawfully in concluding, on advice from Natural England, that the Joint Core Strategy would not be likely to have a significant effect on the Ashdown Forest Special Area of Conservation, in combination with the Wealden Core Strategy, pursuant to the Habitats Regulations.

The judgement found "*that if relevant data and findings are properly amalgamated, as they should be, the effects of increased traffic flows near the SAC would not have been ignored at the screening or scoping stage of the process.*"

Whilst not relevant to Local Plans, it would seem that the judgment considers that any future planning applications within Ashdown Forest, including sites geographically remote from Ashdown Forest, will require a consideration of the potentially cumulative ecological impacts of development on this protected forest. The judge noted – "*[this judgement] will necessarily be relevant to....whether an appropriate assessment is required for individual planning applications*".

This could result in much greater scrutiny of all planning applications in a number of West Sussex Local Planning Authorities, including Horsham Borough Council which is a neighbouring authority to Worthing Borough Council.

## Summary of the draft Worthing Local Plan

### *Vision and Strategic Objectives*

The Local Plan identifies a Vision and a series of Strategic Objectives. The Vision sets out what kind of town Worthing aspires to be by 2033. It responds to local challenges and opportunities, is evidence based and takes account of objectives identified by the community. The Strategic Objectives, that follow, link to the Vision and the three key roles (social, economic and environmental) for the planning system set out in the NPPF.

**V1.** By 2033 Worthing will be recognised as a highly desirable place to live, work and visit, continuing to attract high calibre businesses and significant inward investment that will help the town's economy to grow and improve its regional competitiveness.

**V2.** Regeneration of the town centre and seafront will have built on recent successes to unlock key development sites and deliver a vibrant and diverse retail, cultural and leisure offer for residents and visitors of all ages.

**V3.** Limited land resources will have been developed in the most efficient way to maximise the delivery of the widest range of identified needs, whilst at the same time ensuring that the borough's environment, intrinsic character and its coastal and countryside setting have been protected and enhanced.

**V4.** High quality new development will have been integrated with existing communities and opportunities taken to deliver new and improved facilities and services.

The realisation of the Vision will be dependent on successful delivery of the Local Plan and the implementation of related strategies and programmes progressed by other stakeholders and service providers. The Council has also prepared an Infrastructure Delivery Plan covering the social, physical and green infrastructure required to ensure that sustainable communities are created. This is a 'live' document that will be continually evolving. The Infrastructure Delivery Plan helps to demonstrate the deliverability of the Vision and Strategic Objectives of the Local Plan.

The Strategic Objectives are:

#### **Social**

- SO1** Deliver high quality new homes that best reflect the identified needs within the borough (in terms of size, type and tenure).
- SO2** Ensure that developments provide an appropriate level of affordable housing to help those in housing need.
- SO3** Improve accessibility to services, local centres and the town by sustainable modes of transport, reducing the need to travel by car.
- SO4** Ensure that there is sufficient infrastructure capacity to meet existing needs and the needs arising from new development.
- SO5** Safeguard existing dwellings and the character and amenity of residential areas.
- SO6** Ensure new development integrates into existing communities, supporting local Centres to enhance the well-being of all people, and reduce inequalities.
- SO7** Encourage the creation of healthy environments, improve opportunities to access the natural environment and support healthy and active lifestyles

#### **Economy**

- SO8** Retain and enhance key employment areas and provide a choice of employment sites to meet the needs of existing and future businesses.
- SO9** Strengthen Worthing's town centre as a location for shopping and business and enhance its role as a sub-regional centre.
- SO10** Encourage family friendly and evening economies and improve the retail, cultural and leisure offer in the town centre through the improvement of existing areas, the delivery of new developments and improved connectivity.
- SO11** Enhance the gateway approaches and key transport corridors leading into the town centre.

- SO12** Support Worthing's tourism role through the provision of additional high quality tourism facilities.
- SO13** Deliver high quality public realm and enhanced infrastructure to attract inward investment.
- SO14** Seek to improve the skills of the workforce and quality of the environment to encourage the creation of high value jobs by existing and new businesses.

#### **Environment**

- SO15** Protect, and where possible enhance, valued green spaces, stretches of undeveloped coastline, gaps between settlements and the quality of the natural environment.
- SO16** Improve the quality of the natural environment and public realm within the town centre and along the seafront.
- SO17** Make efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.
- SO18** Protect, maintain and enhance the distinct character, heritage, identity and setting of the borough.
- SO19** Ensure development mitigates the impact of, and helps the borough to adapt to, the effects of climate change, now and in the future.
- SO20** Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion and promote active travel.

#### ***Spatial Strategy***

The spatial strategy seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area. The core principles, set out in the policy below, take account of the characteristics of the borough and provide a clear direction for development in and around the town. The spatial strategy will help to steer new development to the right locations whilst at the same time helping to protect those areas of greatest value / sensitivity.

#### ***Policies of Relevance***

**Policy SP2: Spatial Strategy** - this sets out how the delivery of new development in Worthing up until 2033 will be managed.

**Policy SP3: Development Sites** - this sets out the minimum number of dwellings to be delivered over the plan period and which sites are considered to be key to the delivery of future housing in the borough.

**Policy SP4: Countryside and Undeveloped Coast** - sets out how the countryside and undeveloped coast will be protected.

**Policy SP5: Local Green Gaps** - this policy designates four sites as Local Green Gaps which will help to avoid coalescence and preserve the separate characters and identities of different settlements by providing physical and visual breaks.

**Policy SP6: Local Green Space** - this policy designates three sites as Local Green Space which are considered to be of particular importance.

**Policy CP19: Biodiversity** - seeks to ensure that impacts arising from development on biodiversity are minimised.

#### **Implications of the Local Plan on European Sites**

In respect of the **Duncton and Bignor Escarpment SAC**, the site is 13.9 km away from Worthing boundary. The impact on the SAC would be from increased visitor numbers. The proposed scale of development within Worthing is too distant for major increases and therefore there are no realistic impact pathways present and thus unlikely to damage the feature of interest.

**Significant effects on the Duncton and Bignor Escarpment SAC are screened out. No significant impact likely.**

In respect of the **Arun Valley SPA**, the site is 8.75 km to the north-east from Worthing's boundary. It is physically separated from the main areas of development in Worthing by the South Downs AONB and some distance from these urban areas of development. The proposed scale of development within Worthing are too distant for major increases and therefore there are no realistic impact pathways present and thus unlikely to damage the feature of interest.

With regard to water resources, Worthing lies within the Adur Catchment area and not the Arun Catchment area. Water for developments in Worthing is abstracted from the Worthing Chalk Blocks and not from the Arun Valley. It is considered that the spatial approach identified within Local Plan will not have a significant impact upon the integrity of the site.

**Significant effects on the Arun Valley SPA are screened out. No significant impact likely.**

Both **Castle Hill SAC and Ashdown Forest SAC & SPA** are some significant distance away from the borough boundary. Due to the distances involved, there are no realistic impact pathways present and therefore it is very unlikely that the spatial approach identified within Local Plan will damage the features of interest.

**Significant effects on the Castle Hill SAC and Ashdown Forest SAC & SPA are screened out. No significant impact likely.**

## **Conclusion**

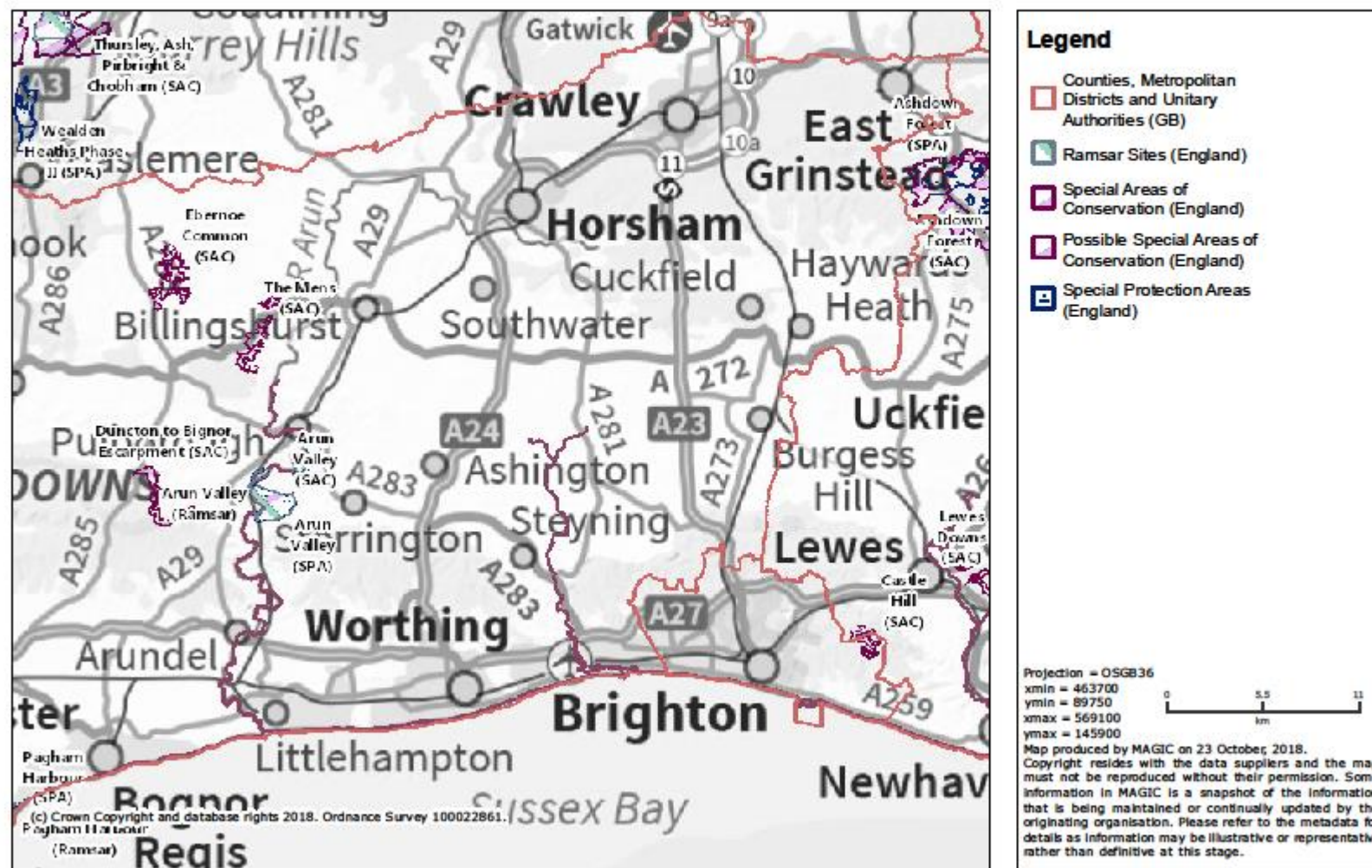
Is the potential scale or magnitude of any effects likely to be significant?

- |   |           |
|---|-----------|
| a) Alone?                                       | <b>No</b> |
| b) In combination with other plans or projects? | <b>No</b> |

This HRA screening statement has found there to be no significant adverse effects on any of the identified European sites arising from the Worthing Local Plan. Therefore the Local Plan does not require progression to the next stage of Habitat Regulations Assessment.



# MAGiC Worthing Local Plan - Relevant European Sites



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**Worthing Borough Council**  
**Planning Policy**  
**Portland House**  
**44, Richmond Road**  
**Worthing**  
**West Sussex**  
**BN11 1HS**



**WORTHING BOROUGH**  
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## Appendix G

### Site Appraisal for Worthing Leisure Centre

SA Objective	Indicator	Criteria	Worthing Leisure Centre	
Environmental Quality	Worthing Air Quality Management Area (AQMA)	R = Within or in close proximity to the AQMA.	The location of this site in Durrington means that although development has the potential to generally increase congestion on the A27. Traffic accessing this site is less likely to travel through the Worthing AQMA than town centre or sites to the East of Worthing.	G
		Y = Sites in Worthing town centre with the potential to increase congestion in and around the AQMA		
		G = Not or less likely to affect congestion in the AQMA		
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	R = Within a Source Protection Zone	Not located in a Source Protection Zone or likely to affect a WFD waterbody	G
		Y = Has the potential affect a WFD Waterbody.		
		G = Not located in a Source Protection Zone or likely to affect a WFD Waterbody.		
Biodiversity	Sites, Habitats and Species	R = Within or likely to impact internationally (SAC, SPA, Ramsar) or nationally (SSSI, National Nature Reserves, National Parks) designated sites.	Whilst the site does contain a significant amount of open space this typically consists of outdoor sport provision as well as some park and recreation space. However it is not identified as including Priority Habitats or Species.	G
		Y = Sites containing or likely to impact locally (designated sites, UK BAP Priority habitats and legally protected species.		
		G = Sites that do not meet the above criteria		
		R = significant levels of contamination expected due to previous or historic uses on the site.		

Land and Soils	Contaminated Land	Y = brownfield site - potentially contaminated land	Greenfield site contamination not likely, although it should be noted there is a depot to the north east of the site which may have potential for contaminated land.	G
		G = greenfield site - contamination not likely		
	Agricultural Land	R = Grade 1 agricultural land	Classed as urban land	G
		Y = Grade 2-3 agricultural land		
		G = Grade 3-5 and non agricultural or urban land		
Energy	Energy use and waste	Not possible to assess this against sites until options are being appraised. Therefore this objective will not be assessed as part of the initial appraisal of sites		
	Flood Risk	R = site is within Flood Zone 3	The site is within Flood Zone 1 but a small part of the site (5%) is at a medium risk of flooding from surface water - 100 yr which is expected to increase in the future with climate change. The site is identified as being at a medium risk of groundwater flooding (0.025 - 0.05m)	Y
		Y = partly Flood Zone 2/3 but development could be located outside of Flood Zone 3, historic flooding or at risk of flooding from other sources.		
		G = Flood Zone 1, no risk posed by other sources of flooding and no records of historic flooding on the site.		
Water Management	Water resources	As the whole area is located in an area of serious water stress this would not show any distinction between sites.		
		R = Adjacent to or considered to form part of the setting of the National Park		
		Y = Considered to make only a limited contribution to the setting of the National Park		
Landscape and character	setting of SDNP	Site is within the urban area of Durrington some distance from the National Park and is therefore unlikely to impact on its setting		
		G		

		G = Site is within core urban area and is unlikely to impact on the setting of the National Park		
	coalescence	R = development of the site would impact on the visual or physical separation between settlements. Y = forms part of the gap but development would not impact on the overall separation between settlements. G = forms no visual or physical separation between settlements.	The site does not form visual or physical separation between settlements	G
	undeveloped coastline and countryside	R = Located outside of the Built Up Area Boundary Y = Located adjacent to the Built Up Area Boundary G = Located within the Built Up Area Boundary	The site is within the Built Up Area Boundary	G
Built environment	derelict sites	R = Greenfield or currently undeveloped site Y = Brownfield site currently in use G = Derelict or vacant site	The site consists of a mixture of greenfield (sport pitches and playing fields) and brownfield (onsite leisure centre currently in use)	R
Historic Environment	Designated Heritage Assets	R = the site contains or is immediately adjacent to a designated heritage asset. Y = the site is located close to designated or locally listed heritage assets. G = the site is not adjacent to and does not contain any designated or locally listed heritage assets.	The site does not contain any designated or locally listed heritage assets. However it is located near to both the Robson Road and Shaftesbury Avenue Conservation Areas.	Y
	Archaeology	R = within an Archaeological Notification	The site is not within or adjacent to an	G

		Area	Archaeological Notification Area	
		Y = Adjacent to an Archaeological Notification Area		
		G = Not within or adjacent to an Archaeological Notification Area		
	Accessible open space	R = The site contains accessible open space. Development could potentially result in the loss of open space.	The site contains accessible open space in the form of outdoor sport (private), park and recreation grounds, play (child) and play (youth) spaces.	R
		Y = There is no accessible open space within the acceptable walking distance of the site.		
		G = there is accessible open space within the accessibility standard for walking		
Healthy Lifestyles	sport and recreation	R = would result in the loss of playing pitches or indoor sport facilities.	Development would result in the loss of current sport facilities. Although the expectation would be that any development would be to provide replacement facilities.	R
		Y = would result in the loss of playing pitches or indoor sport facilities but an alternative has already been provided.		
		G = new playing pitches or indoor sport facilities would be provided.		
Crime and public safety	Indices of Multiple Deprivation	Sites within 10 most deprived LSOA in West Sussex	The most recent data is the 2019 English Indices of Deprivation. The site is within LSOA Worthing 012E which is within the IMD decile: 9 so among the least deprived in West Sussex.	G
		Sites within 10 most deprived LSOA in Worthing (other than above)		
		Outside of the above		
Housing	Delivering new homes of the right mix and tenure	<i>It is not possible at this stage to make this kind of assessment on what a site could provide. However this will be assessed fully when policies relating to the sites are</i>		

		<i>assessed.</i>		
Communities	Proximity to Doctors Surgeries	The site currently includes a doctors surgery which as a result of development could potentially be lost.	The site is within 800m of Cornerways Surgery.	G
		The site is not within 800m of a doctor surgery		
		The site is within 800m of a doctors surgery		
	Proximity to Libraries	The site currently includes a library which as a result of development could potentially be lost.	The site is not within 800m of a library	Y
		The site is not within 800m of a library		
		The site is within 800m of a library		
Education	Proximity to primary schools (infant, junior)	The site currently includes, or land associated with, a primary school which as a result of development could potentially be lost	The site is within 1km of a primary school	G
		The site is further than 1km from a primary, infant or junior school		
		The site is within 1km of a primary, infant or junior school.		
	Proximity to secondary schools	The site currently includes, or land associated with, a secondary school which as a result of development could potentially be lost	The site is within 1.5km of a secondary school	G
		The site is further than 1.5km from a secondary school		
		The site is within 1.5km of a secondary school.		

Economy	key office location or industrial estate	Within a key office location/industrial estate/business park or currently providing employment space	The site is not within or adjacent to a protected employment area.	G
		Adjoining a key office location/industrial estate/business park		
		None of the above		
Town centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	Within a District or Local Centre	The site is within 800m of Goring Road District Centre and The Strand Local Centre.	G
		Sites not within 800m of the Town Centre or a District or Local Centre		
		Sites within the Town Centre or within 800m of a District or Local Centre		
Travel and Access	Proximity to train station	N/A	The site is within 800m of Durrington-on-Sea station	G
		Over 800m from the nearest train station		
		Within 800m from the nearest train station		

## Site Appraisal for Aquarena

SA Objective	Indicator	Criteria	Aquarena	
Environmental Quality	Worthing Air Quality Management Area (AQMA)	R = Within or in close proximity to the AQMA	The site is not located in close proximity to the Worthing AQMA. However, any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
		Y = Sites with the potential to increase congestion in and around the AQMA		
		G = Not likely to affect congestion in the AQMA		
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	R = Within a Source Protection Zone	Not located in a Source Protection Zone or likely to affect a WFD waterbody.	G
		Y = Has the potential affect a WFD Waterbody		
		G = Not located in a Source Protection Zone or likely to affect a WFD Waterbody		
	Noise	R = Road or rail noise exceeding 75 dB(A)	The site is adjacent to the A259 - a source of road noise.	Y
		Y = Road or rail noise exceeding 55 dB(A)		
		G = Not within an area identified as experiencing significant road or rail noise		
	Sites, Habitats and Species	R = Within or likely to impact internationally (SAC, SPA, Ramsar) or nationally (SSSI, National Nature Reserves, National Parks) designated sites	Site does not meet the criteria.	G
		Y = Sites containing or likely to impact locally (designated sites, UK BAP Priority habitats and legally protected species)		
Biodiversity	Sites, Habitats and Species		Site does not meet the criteria.	G



		G = Sites that do not meet the above criteria		
Land and Soils	Potentially Contaminated Land	R = Significant levels of contamination expected due to previous or historic uses on the site	Non PCL	G
		Y = Potentially contaminated land (PCL)		
		G = Non - potentially contaminated land (PCL)		
	Agricultural Land	R = Grade 1-3 agricultural land	Previously developed urban land.	G
		Y = Grade 3-5 agricultural land		
		G = Non agricultural or urban land		
Water Management	Flooding from Rivers and Sea	R = Flood Zone 3	The whole site is located in Flood Zone 3. The risks must be managed so that any development is safe across its lifetime without increasing flood risk elsewhere.	R
		Y = Flood Zone 2		
		G = Flood Zone 1		
	Surface Water (awaiting maps)	R = The area has a high chance of flooding from surface water (greater than 3.3%)	The southern part of the site has a medium chance of flooding from surface water.	Y
		Y = The area has a medium chance of flooding from surface water (1% to 3.3%)		
		G = The area has a low (0.1% - 1%) or very low (less than 0.1%) chance of flooding from surface water		
	Groundwater	R = The area is considered to be at a high risk (greater than 50%) of groundwater flooding	The site is in an area considered to be at a low risk of groundwater flooding.	G
		Y = The area is considered to be at a medium risk (25% - 50%) of groundwater		

		flooding		
		G = The area is considered to be at a low risk (less than 25%) risk of groundwater flooding		
		R = Adjacent to or considered to form part of the setting of the National Park		
		Y = Considered to make only a limited contribution to the setting of the National Park		
	Setting of South Downs National Park	G = Site is within core urban area and is unlikely to impact on the setting of the National Park	Due to the distance from the National Park and urban setting, the site is unlikely to impact on its setting. However, this will depend on the specific nature of development and will need to be considered and assessed at the planning application stage.	G
		R = Development of the site would impact on the visual or physical separation between settlements		
		Y = Forms part of the gap but development would not impact on the overall separation between settlements		
	Coalescence	G = Forms no visual or physical separation between settlements	The site forms no visual or physical separation between settlements.	G
		R = Located outside of the Built Up Area Boundary		
		Y = Partly within/outside the Built Up Area Boundary		
Landscape and character	Undeveloped coastline and countryside	G = Located within the Built Up Area Boundary	Located within the Built Up Area Boundary.	G
		R = Greenfield or currently undeveloped site		
Built environment	Derelict sites		Derelict site.	G

		Y = Previously developed land, currently in use		
		G = Previously developed land, derelict or vacant site		
Historic Environment	Designated Heritage Assets	R = The site contains a designated heritage asset	Located 120m from Beach House, a Grade II* Listed Building, and adjacent to Farncombe Road Conservation Area which is to the north of the site. Sensitive design will be required to ensure no significant harm is caused to heritage assets and their setting.	Y
		Y = The site is located close to a designated heritage asset		
		G = The site is not adjacent to and does not contain any designated heritage assets.		
	Archaeology	R = Within an Archaeological Notification Area	Not within or adjacent to an Archaeological Notification Area.	G
		Y = Adjacent to an Archaeological Notification Area		
		G = Not within or adjacent to an Archaeological Notification Area		
Healthy Lifestyles	Accessible open space, sport and leisure	R = The site contains accessible open space, indoor or outdoor sport facilities including playing pitches	The site is immediately adjacent to semi-natural greenspace in the form of the seafront to the south and is surrounded by a number of parks and gardens with Beach House Grounds and Denton Gardens to the west which also encompasses a children's play area, Beach House Park to the north west and New Parade to the south east. However, there are no allotments within the 10 minute walk standard or amenity greenspace within the 5 minute walk standard. The site contains a former leisure centre which was closed following the opening of an adjacent replacement centre in 2013.	G
		Y = There is no accessible open space within the acceptable walking distance of the site		
		G = There is accessible open space within the accessibility standard for walking		

Crime and public safety	Indices of Multiple Deprivation	R = Sites within 10 most deprived LSOA in West Sussex	Ranked as the 7th most deprived area in Worthing according to the IMD 2015.	Y
		Y = Sites within 10 most deprived LSOA in Worthing (other than above)		
		G = Outside of the above		
Communities	Proximity to doctor's Surgeries	R = The site currently includes a doctor's surgery which as a result of development could potentially be lost.	Is within 800m (approx 200m) from Selden Medical Centre.	G
		Y = The site is not within 800m of a doctor surgery		
		G = The site is within 800m of a doctor's surgery		
	Proximity to Libraries	R = The site currently includes a library which as a result of development could potentially be lost	The nearest library (Worthing Library) is approximately 850m away.	Y
		Y = The site is not within 800m of a library		
		G = The site is within 800m of a library		
Education	Proximity to primary schools (infant, junior)	R = The site currently includes, or land associated with, a primary school which as a result of development could potentially be lost	Within 700m of Lyndhurst First School.	G
		Y = The site is not within 1 km from a primary, infant or junior school		
		G = The site is within 1 km of a primary, infant or junior school		
	Proximity to secondary schools	R = The site currently includes, or land associated with, a primary school which as a result of development could	Worthing High School, St Andrews Church of England High School for Boys and Davison Church of England Comprehensive School for	G

		<p>potentially be lost</p> <p>Y = The site is not within 1.5km from a primary, infant or junior school</p> <p>G = The site is within 1.5km of a primary, infant or junior school.</p>	Girls are all within 2km. Davison is the nearest school approximately 900m away.	
Economy	Key office location or industrial estate	<p>R = Within a key office location/industrial estate/business park or currently providing employment space</p> <p>Y = Sites previously in employment use</p> <p>G = None of the above</p>	This was previously the site for a Leisure Centre which provided some employment. However, a replacement leisure centre has been opened on the adjacent site.	G
Town centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	<p>R = N/A</p> <p>Y = Sites more than 800m of a Town Centre</p> <p>G = Sites in or within 800m of a Town Centre</p>	The site is within 800m of Ham Road Local Centre and the Town Centre Boundary.	G
Travel and Access	Proximity to train station	<p>R = N/A</p> <p>Y = Over 800m from the nearest train station</p> <p>G = Within 800m from the nearest train station</p>	Not within acceptable walking distance of a train station.	Y
	Proximity to cycle routes	<p>R = N/A</p> <p>Y = Over 1 km from the nearest cycle route</p> <p>G = Within 1 km of the nearest cycle route</p>	The South Coast Route runs along the seafront to the south of the site.	G

<b>Conclusions</b>	<p>Positives:</p> <ul style="list-style-type: none"><li>• It is a vacant brownfield site providing an opportunity for regeneration.</li><li>• Located within the Built Up Area Boundary.</li></ul>	<p>Negatives:</p> <ul style="list-style-type: none"><li>• The site is in Flood Zone 3.</li></ul>	Y
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## Site Appraisal for Land North of West Durrington

SA Objective	Indicator	Criteria	Land North of West Durrington Development	
Environmental Quality	Worthing Air Quality Management Area (AQMA)	R = Within or in close proximity to the AQMA.	The site is not located in close proximity to the Worthing AQMA. However any development in Worthing without mitigation, has the potential to increase congestion along the A27, in and around the AQMA.	Y
		Y = Sites with the potential to increase congestion in and around the AQMA		
		G = Not likely to affect congestion in the AQMA		
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	R = Within a Source Protection Zone	Within a Source Protection Zone 1. Mitigation should be provided to protect groundwater from pollution and promote the use of appropriate SuDS.	R
		Y = Has the potential affect a WFD Waterbody.		
		G = Not located in a Source Protection Zone or likely to affect a WFD Waterbody.		
	Noise	R = Road or rail noise exceeding 75 dB(A)	The whole of the site experiences noise associated with the A27 to the north.	Y
		Y = Road or rail noise exceeding 55 dB(A)		
		G = Not within an area identified as experiencing significant road or rail noise		
		R = Within or likely to impact internationally (SAC, SPA, Ramsar) or nationally (SSSI, National Nature Reserves, National Parks) designated sites.		

		<p>Y = Sites containing or likely to impact locally (designated sites, UK BAP Priority habitats and legally protected species.</p> <p>G = Sites that do not meet the above criteria</p>	<p>The Worthing Landscape &amp; Ecology Study 2017 describes the site as comprising of agricultural land including small species-poor grassland fields in permanent pasture and a larger field in the west of the site considered of negligible/ less than local conservation interest. The habitat of greatest value within the site is the pond in the south-west of the site which contributes to a network of ponds considered of moderate local value. The boundaries of the site generally comprise native hedgerows and/or scattered scrub and mature trees providing wildlife corridors considered in combination to be of moderate local wildlife value. Titnore &amp; Goring Woods Complex Local Wildlife Site is located approximately 130m south-west of the site. Sussex Biodiversity Centre has records of Great Crested Newt, a European Protected Species and grass snake, a legally protected species under the Wildlife and Countryside Act (WCA) adjacent to the site.</p>	
	Potentially Contaminated Land	<p>R = Significant levels of contamination expected due to previous or historic uses on the site.</p> <p>Y = Potentially contaminated land (PCL)</p> <p>G = Non - potentially contaminated land (PCL)</p>	<p>The site contains three areas of PCL (the Hermitage, Forest Farm and Cherwell Road).</p>	Y
Land and Soils	Agricultural Land	<p>R = Grade 1-3 agricultural land</p> <p>Y = Grade 3-5 agricultural land</p> <p>G = Non agricultural or urban land</p>	Grade 2	R
		R = Flood Zone 3		



Water Management	Flooding from Rivers and Sea	Y = Flood Zone 2	Flood Zone 1	G
		G = Flood Zone 1		
	Surface Water (awaiting maps)	R = The area has a high chance of flooding from surface water (greater than 3.3%)	Parts of the site are in areas with a high chance of flooding from surface water.	R
		Y = The area has a medium chance of flooding from surface water (1% to 3.3%)		
		G = The area has a low (0.1% - 1%) or very low (less than 0.1%) chance of flooding from surface water		
Landscape and character	Groundwater	R = The area is considered to be at a high risk (greater than 50%) of groundwater flooding	The site is in an area considered to be at a low risk of groundwater flooding.	G
		Y = The area is considered to be at a medium risk (25% - 50%) of groundwater flooding.		
		G = The area is considered to be at a low risk (less than 25%) risk of groundwater flooding.		
	Setting of South Downs National Park	R = Adjacent to or considered to form part of the setting of the National Park Y = Considered to make only a limited contribution to the setting of the National Park G = Site is within core urban area and is unlikely to impact on the setting of the National Park	The site is adjacent to the South Downs National Park to the north and west. The Landscape and Ecology Study 2017 splits the site into thirds. It states that the western third is visible from high ground within the SDNP to the north and south and forms part of the continuum of undeveloped land in views between the two forming part of the undeveloped southern setting to the National Park. However the eastern 2/3 have limited views to and from the SDNP and provide a small part of	Y

			undeveloped southern setting to the Park.	
	Coalescence	R = Development of the site would impact on the visual or physical separation between settlements.	The Landscape and Ecology Study 2017 concludes that the western part of the site forms part of the gap between West Durrington and the Castle Goring Conservation Area. However the rest of the site forms no significant visual or physical separation between settlements.	Y
		Y = Forms part of the gap but development would not impact on the overall separation between settlements.		
		G = Forms no visual or physical separation between settlements.		
	Undeveloped coastline and countryside	R = Located outside of the Built Up Area Boundary	Located within the Built Up Area Boundary adjacent to countryside. The Worthing Landscape and Ecology Study 2017 considers the site as part of the rural farmland of the upper coastal plain.	G
		Y = Partly within/outside the Built Up Area Boundary		
		G = Located within the Built Up Area Boundary		
Built environment	Derelict sites	R = Greenfield or currently undeveloped site	Greenfield site	R
		Y = Previously developed land, currently in use		
		G = Previously developed land, derelict or vacant site		
Historic Environment	Designated Heritage Assets	R = The site contains a designated heritage asset.	The site is located to the east of the Castle Goring Conservation Area. It is located 350m east of Castle Goring a Grade I Listed Building with its associated Grade II Listed Buildings closer to the site. Located in the centre of the site along its northern boundary is the Coach and Horses Public House and Stanhope Lodge, both Grade II Listed. Mitigation	R
		Y = The site is located close to a designated heritage asset.		
		G = The site is not adjacent to and does not contain any designated		

		heritage assets.	should be incorporated to protect and enhance the asset and its setting. Sensitive design will be required to ensure no significant harm is caused to heritage assets and their setting.	
	Archaeology	R = Within an Archaeological Notification Area Y = Adjacent to an Archaeological Notification Area G = Not within or adjacent to an Archaeological Notification Area	Not within or adjacent to an Archaeological Notification Area.	G
Healthy Lifestyles	Accessible open space, sport and leisure	R = The site contains accessible open space, indoor or outdoor sport facilities including playing pitches. Y = There is no accessible open space within the acceptable walking distance of the site. G = There is accessible open space within the accessibility standard for walking	The site is within a 15min walk of semi-natural greenspace with Fulbeck Avenue natural and semi-natural to the south of the site. However there are no parks and gardens within the 15 minute walk standard or amenity greenspace within the 5 minute walk standard.	G
Crime and public safety	Indices of Multiple Deprivation	R = Sites within 10 most deprived LSOA in West Sussex Y = Sites within 10 most deprived LSOA in Worthing (other than above) G = Outside of the above	Ranked as the 3rd most deprived area in Worthing according to the IMD 2015.	Y
Communities	Proximity to doctor's Surgeries	R = The site currently includes a doctor's surgery which as a result of development could potentially be lost. Y = The site is not within 800m of a doctor surgery	The site is not within 800m of a doctor surgery. The nearest surgery (The Mayflower Surgery, The Strand Surgery and Victoria Road Practice) is approximately 1200m away.	Y

	Proximity to Libraries	G = The site is within 800m of a doctor's surgery	The nearest library (Durrington Library) is approximately 1500m away.	Y
		R = The site currently includes a library which as a result of development could potentially be lost.		
		Y = The site is not within 800m of a library		
		G = The site is within 800m of a library		
Education	Proximity to primary schools (infant, junior)	R = The site currently includes, or land associated with, a primary school which as a result of development could potentially be lost	The Laurels Primary School is approximately 1 km away. However a new school is planned as part of the West Durrington development.	Y
		Y = The site is not within 1 km from a primary, infant or junior school		
		G = The site is within 1 km of a primary, infant or junior school.		
	Proximity to secondary schools	R = The site currently includes, or land associated with, a primary school which as a result of development could potentially be lost	Durrington High School is approximately 1.8km away.	Y
		Y = The site is not within 1.5km from a primary, infant or junior school		
		G = The site is within 1.5km of a primary, infant or junior school.		
Economy	Key office location or industrial estate	R = Within a key office location/industrial estate/business park or currently providing employment space	The site is undeveloped - would not result in any potential loss of employment space.	G

		Y = Sites previously in employment use		
		G = None of the above		
Town centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	R = N/A	The site is within 800m of West Durrington District Centre.	G
		Y = Sites more than 800m of a Town Centre		
		G = Sites in or within 800m of a Town Centre		
Travel and Access	Proximity to train station	R = N/A	Not within acceptable walking distance of a train station.	Y
		Y = Over 800m from the nearest train station		
		G = Within 800m from the nearest train station		
	Proximity to cycle routes	R = N/A	The site is not within 1 km of a cycle route.	Y
		Y = Over 1 km from the nearest cycle route		
		G = Within 1 km of the nearest cycle route		
Conclusions:		Positives: <ul style="list-style-type: none"><li>• The site is in Flood Zone 1.</li><li>• Located within the Built Up Area Boundary.</li></ul>	Negatives: <ul style="list-style-type: none"><li>• Within a Source Protection Zone 1.</li><li>• Potentially contaminated land.</li><li>• Parts of the site have a high chance of surface water flooding.</li><li>• The western portion of the site is visible from the SDNP and is considered to form part of the undeveloped southern setting to the NP.</li><li>• Castle Goring, a Grade I Listed Building is located to the east of the site.</li></ul>	Y