

WORTHING LOCAL PLAN 2020- 2036

MOD3

Addendum to the Submission SA Report: Proposed Main Modifications to the Submission Worthing Local Plan

April 2022



WORTHING BOROUGH
COUNCIL



Addendum to the Submission SA Report:

**Proposed Main Modifications to the Worthing Local Plan
March 2022**

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1. Introduction

1.1 Purpose of this report

1.1.1 This document comprises the Sustainability Appraisal (SA) Addendum of the Proposed Main Modifications to the Worthing Local Plan.

1.1.2 This SA carries out an iterative assessment and sets out the assessment findings and conclusions of the SA Addendum, incorporating the requirements of Strategic Environmental Assessment, of the proposed modifications to the Submission Draft Worthing Local Plan.

1.1.3 This SA Addendum does not repeat information produced in the Submission SA Report (January 2021) (CD/G/4) or the subsequent SA Update (March 2022) and should therefore be read alongside these.

1.1.4 This SA Addendum considers the proposed Main Modifications to the Worthing Local Plan. The proposed modifications to the Local Plan have arisen as a result of:

- representations received during consultation at Publication stage,
- the Inspectors' Matters Issues and Questions (IL05 September 2021),
- discussions that took place during the Examination in Public (November 2021), and
- the Inspectors' Post Hearing Advice Letter (IL07 December 2021).

1.2 Background

1.2.1 The Worthing Local Plan was submitted for Examination in June 2021. Hearing Sessions were then held in November 2021. Following the close of the Hearing Sessions, in December the Council received the Inspector's Post Hearing Advice Letter (IL07). As indicated in this letter, Main Modifications are necessary to make the Plan sound and legally compliant. A schedule of Main Modifications has now been agreed and these will be subject to consultation for a minimum of 6 weeks. Additional Modifications are also proposed. These are non-consequential changes and are not necessary for soundness. These changes make the Plan clearer and provide factual updates but don't materially affect the implementation of the plan policies.

1.3 SA Undertaken

1.3.1 At each stage of preparation, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken and the following documents have been produced and made available for consultation:

- SA Scoping Report 2015
- Draft Integrated Impact Assessment 2018
- Submission SA Report 2021

1.3.2 Following Examination Hearings an Update to the Submission SA Report (2022) has also been produced which should be read alongside it.

1.3.3 This SA Addendum is in addition to the above documents and has been undertaken in order to be consistent and in compliance with the SEA process and regulations which requires SEA to be undertaken on modifications where they are significant in nature.

2. Methodology

2.1 SA Framework

2.1.1 The SA has tested the proposed changes to the Submission Draft Worthing Local Plan against a framework of objectives that reflect relevant sustainable development policy objectives. This framework was initially developed in the SA Scoping Report, 2015.

Table 1 SA Framework

Objective	Supporting Criteria <i>Will the site/policy proposal under consideration...</i>
<p>1. Environmental Quality</p> <p>To protect and improve air and water quality and reduce pollution.</p>	<ul style="list-style-type: none"> • Contribute to achieving good ecological status or potential as a requirement under WFD? • Ensure there is adequate capacity in water and wastewater infrastructure? • Minimise health risks associated with pollution? • Improve local air quality, especially in AQMAs?
<p>2. Biodiversity</p> <p>To conserve, protect and enhance habitats and natural species diversity, green infrastructure networks and wildlife corridors.</p>	<ul style="list-style-type: none"> • Achieve a net gain in biodiversity locally? • Ensure no net loss of Priority Habitat? • Deliver opportunities to protect, restore or enhance biodiversity? • Promote the connectivity of habitats as part of an ecological network?
<p>3. Land and Soils</p> <p>Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials.</p>	<ul style="list-style-type: none"> • Direct development to brownfield sites before Greenfield? • Support remediation of contamination as part of the redevelopment of brownfield sites? • Protect agricultural and best and most versatile soil? • Encourage the re-use of buildings? • Help to reduce the number of vacant / derelict buildings?

<p>4. Energy</p> <p>To support the transition to achieving carbon neutrality, contributing to climate change mitigation.</p>	<ul style="list-style-type: none"> • Increase the amount of energy from renewable and low carbon technologies? • Improve insulation, internal air quality and energy efficiency in existing housing to reduce fuel poverty? • Promote recycling, reuse and reduction of materials to reduce the levels of waste to landfill? • Help reduce carbon emissions?
<p>5. Water Management</p> <p>To ensure water is effectively managed to adapt to the effects of climate change.</p>	<ul style="list-style-type: none"> • Reduce demand for water to help manage droughts? • Promote the use of Sustainable Drainage Systems (SuDS)? • Direct development to areas of lowest flood risk? • Safely manage and reduce the risk of flooding? • Minimise the impacts of climate change such as heatwaves on health and well-being, particularly on vulnerable groups?
<p>6. Landscape and Character</p> <p>To protect and enhance landscape, the quality, character and appearance of the landscape, maintaining and strengthening local distinctiveness and sense of place.</p>	<ul style="list-style-type: none"> • Conserve and enhance the character and quality of natural landscapes, countryside and coast? • Protect and enhance the setting to the South Downs National Park? • Respect existing settlement patterns and maintain separation between settlements? • Ensure new development is appropriately integrated with existing development and the surrounding environment?
<p>7. Built Environment</p> <p>To protect the built character of the townscape and secure the delivery of high quality design.</p>	<ul style="list-style-type: none"> • Promote high quality urban design? • Protect and enhance the character and local distinctiveness of townscapes? • Ensure integration of new development with their surrounding context? • Enhance and promote the perceived sense of place? • Enhance the quality of the public realm?
<p>8. Historic Environment</p> <p>To preserve and enhance the historic environment.</p>	<ul style="list-style-type: none"> • Conserve or enhance heritage assets (including designated and locally important assets) and their setting? • Promote the sensitive re-use of historic or culturally important buildings where appropriate?

<p>9. Healthy Lifestyles</p> <p>To help people live healthier lifestyles and reduce inequalities through physical activity and maximise health and well-being.</p>	<ul style="list-style-type: none"> • Promote active travel by improving access to footpaths and cycle routes? • Provide opportunities for play, sport and recreation? • Promote access to healthier foods / allotments / food growing? • Increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities? • Improve the quantity and quality of publicly accessible open space?
<p>10. Crime and Public Safety</p> <p>To create safe sustainable environments which promote social cohesion, security and reduce fear of crime.</p>	<ul style="list-style-type: none"> • Promote sustainable mixed use environments? • Improve road safety for all users? • Ensure sites are designed in a way to promote natural surveillance? • Reduce levels of crime, the fear of crime and anti-social behaviour?
<p>11. Housing</p> <p>To provide high quality homes for all (including affordable), which includes a range of size, types and tenures that are appropriate to local needs?</p>	<ul style="list-style-type: none"> • Support increased dwelling completions to meet the local need? • Provide high quality homes within an attractive environment? • Deliver a mix of housing to meet identified needs of key local groups? • Increase the supply of affordable housing? • Reduce homelessness? • Provide adaptable homes for independent living for older and disabled people? • Provide homes that meet the needs of older people including extra care?

<p>12. Communities</p> <p>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.</p>	<ul style="list-style-type: none"> • Provide key services and facilities? • Create communities that are adaptable to the needs of an increasingly elderly population including dementia friendly development? • Ensure infrastructure has sufficient capacity to support new communities? • Help reduce social inequality, poverty and social exclusion in communities in the area? • Promote accessibility for those who are elderly or disabled? • 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?
<p>13. Education</p> <p>Raise educational achievement and skills levels to enable current and future residents to remain in work, and access good quality jobs.</p>	<ul style="list-style-type: none"> • Improve accessibility to existing educational facilities? • Facilitate the provision of new high quality educational facilities? • Ensure adequate provision of skills/training facilities?
<p>14. Economy</p> <p>To attract and sustain inward investment and support sustainable growth of industry to improve the resilience and diversity of the local economy.</p>	<ul style="list-style-type: none"> • Facilitate a sustainable visitor economy? • Provide space for new businesses and to enable the expansion of existing? • Increase the number, variety and quality of employment opportunities? • Facilitate the provision of good quality infrastructure to promote economic growth?
<p>15. Town and Local Centres</p> <p>Improve the range, quality and accessibility of wider town centre uses, and ensure the vitality and viability of existing centres.</p>	<ul style="list-style-type: none"> • Provide new or improved leisure, recreational, or cultural activities? • Maintain or increase the amount of floorspace provided for 'town centre uses' within town centres? • Protect key retail areas? • Facilitate regeneration?

16. Travel and Access Improve access to and from sustainable modes of transport.	<ul style="list-style-type: none"> • Increase non-car accessibility to existing services/facilities? • Encourage active travel? • Promote accessibility and safe local routes for pedestrians and cyclists? • Ensure streets are designed to be safe, functional and accessible for all? • Integrate with existing transport networks?
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2.2 Scoring

2.2.1 The SA uses the following methodology to demonstrate impact:

Table 2: Scoring

++	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

2.2.2 Account is taken of the probability, duration, frequency and reversibility of effects as far as possible.

2.2.4 All policies that have been affected by Main Modifications have been re-appraised to identify whether there is any impact on the SA Objectives. Where this has resulted in a change to the SA Scoring, the effects of implementing the amended policies in combination with the other policies of the Local Plan has also been considered to ensure the cumulative effects of the entire Plan, as modified, are understood.

A separate schedule of Additional Modifications to the Local Plan has also been prepared. These have been screened out of SA as they would not have any impact on the SA Objectives.

3. Assessment

3.1 Approach

3.1.1 For each policy an overview of the appraisal from the Submission SA Report is shown (full appraisals can be found in Appendix D of the Submission SA Report) and a description given of the proposed Main Modification. Any changes to the scoring against the objectives are shown along with an explanation of the reasons for these changes. Where the appraisal scores have not changed confirmation is provided that the proposed Modifications have had no impact on the SA Objectives. The full appraisal for each modified policy is included in Appendix 1 to this Addendum.

3.2 Appraisal of Main Modifications

SP2 - Climate Change

3.2.1 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:

SP2 Climate Change								
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	+

3.2.2 Proposed modification MM3 seeks the following amendments:

Para 2.20 - add new bullet point: demonstrate that the development will protect and enhance the borough's natural capital and biodiversity assets

SP2 - insert new policy criterion - **k) Development must not compromise land that is required to deliver towards a nature recovery network.**

The proposed amendments to the supporting text and Policy SP2 are in response to the representation received from Sussex Wildlife Trust (SDWLP-57).

3.2.3 The policy has been reappraised and it is considered that the additional criterion will further strengthen objective 2: Biodiversity as it will provide an extra policy test seeking to protect the borough's natural capital and biodiversity assets. Objective 2 of the SA assessment has been revised from a score of positive to very positive significant effects. The results of its appraisal are copied below:

SP2 Climate Change								
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	+

3.2.4 As can be seen from the table above the key change as a result of the proposed modifications has been the change against the Biodiversity objective (number 2). Proposed modification MM3 seeks to introduce a new criterion (k) to ensure that development must not compromise land that is required to deliver towards a nature recovery network. This has resulted in the assessment being revised from positive to very positive significant effects.

SP3 - Healthy Communities

3.2.5 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	++

3.2.6 Proposed modification MM4 seeks a number of amendments pertaining supporting text paragraphs 2.26, 2.36 and 2.37. In addition, criterion a) has been amended to merge with criterion b). The proposed amendments have been made as a result of the discussions held during the hearing session and in response to MIQ-24.

3.2.7 It is considered that criterion a) doesn't aid implementation of the policy and thus reference to the Public Health Strategy is strengthened within supporting text 2.26. Supporting text 2.36 has been strengthened to provide clarity on how the Health Impact Assessment will be applied. The proposed modifications do not change the general thrust of policy SP3 therefore it is considered that there is no change to the SA assessment for this policy.

SS1 - Spatial strategy

3.2.8 The Submission Draft version of this policy 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	+	+	/	+	+	?

3.2.9 Proposed modification MM5 seeks to revise criterion a) of the policy to read:

a) will seek to deliver high quality development and provide for the needs of.....

This change to the text was required to accord with the revised NPPF (July 2021) Paragraph 20.

3.2.10 It is considered that the changed wording within criteria a) does not alter the scoring of this policy against the SA objectives.

SS2 - Development Sites

3.2.11 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	+	?	+	?	?	+	+	?

3.2.12 The Proposed Modification MM29 seeks to delete the proposed allocation A13 Titnore Lane to accord with the Inspectors Post Hearing Advice Letter (IL07) which concluded that the risk of adverse impacts from developing the site would significantly and demonstrably outweigh the benefits. The allocation is not justified or consistent with national policy and therefore no other options were identified as a reasonable alternative to this proposed modification.

3.2.13 Whilst the removal of the site reduces the overall proposed supply of housing by 60 dwellings it is not considered that this results in a change to the overall thrust of the policy and of the assessment of the policy against the SA objectives. Proposed Modification MM7 shows an increase in the amount of housing on other sites, the result of this is that despite the removal of site A13, the overall supply of housing through Local Plan allocations remains unchanged.

SS3 - Town Centre

3.2.14 The Submission Draft version of 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	++	++	+

3.2.15 Proposed modification MM7 seeks to make a number of changes to the supporting text to the policy and the policy itself to respond to issues raised during consultation and the examination hearing sessions to ensure that the policy is effective.

3.2.16 Amendments to the supporting text at paras 3.35 and 3.36 seek to highlight the important role local independent business has within the local economy and the town centre in particular.

3.2.17 The policy itself has been slightly reordered to add clarity but the key change has been the proposed introduction of the following criteria:

g) As part of the development of the Green Infrastructure Strategy the Council will consider opportunities to integrate biodiversity within the town centre to address climate adaptation and ecological connectivity

SS3 - Town Centre								
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	++	++	+

3.2.18 It is considered that proposed modification MM7 results in a change to the Biodiversity objective (number 2) and subsequently the scoring has been revised from no effect to a positive effect in recognition of the new criterion which seeks to consider opportunities to integrate biodiversity within the town centre to address climate change and ecological connectivity.

SS4 - Countryside and undeveloped coast

3.2.19 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	+

3.2.20 Proposed modification MM8 seek to amend three of the criteria to ensure that they reflect paragraph 176 of the NPPF to ensure consistency and conformity with National Policy. Revised criterion a) now clarifies that land outside the BUAB - excluding sites designated as Local Green Space under SS6 will be defined as 'countryside and coast'. Revised criterion b) clarifies that applications for the development of entry level exception sites will be supported subject to specific criteria and revised criterion f) requires any development within the setting of the National Park should avoid or minimise any adverse impact on the designated areas.

3.2.21 Despite the proposed modifications to the policy there has been no change to the policy as assessed against the SA objectives.

SS5 - Local green gaps

3.2.22 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	+

3.2.23 Proposed modification MM9 seeks to amend this policy so that it only applies outside of those sites designated as Local Green Space. Criteria i) and ii) of the policy have also been amended to better reflect the characteristics and function of the Gap.

SS5 - Local Green Gaps								
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	+

3.2.24 The exclusion of those sites designated as Local Green Space is the most significant modification proposed to this Policy as it limits the positive effects of this Policy on those sites. As a result the policy scored as having no effect against Objectives 1, 2 and 9.

SS6 - Local green spaces

3.2.25 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:

SS6 - 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	+

3.26 Modification MM10 removed Goring Ferring Gap and Chatsmore Farm from this designation leaving Brooklands Park. It also deletes and replaces the policy criteria to ensure it is consistent with national planning policy for Green Belt.

SS6 - Local Green Spaces								
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	+

3.2.27 Despite the significant changes proposed by MM10, the scores remained relatively unchanged with the only difference being the positive effect against the historic environment objective now having no effect. This is because the remaining Local Green Space (Brooklands) was not designated and does not have any historic significance.

3.2.28 The scoring reflects how by protecting these areas most types of development will be restricted further reducing the land available to provide housing and reduce the shortfall in meeting local needs. This is balanced against very positive effects against the communities objective and positive effects against a range of other objectives reflecting the range of reasons these sites are valued.

A1 - Beeches Avenue

3.2.29 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	+

3.2.30 Proposed modification MM16 results in a number of development requirements being strengthened and more detailed, criterion g) has been deleted and one new development requirement being added. The proposed deletion of criterion g) has been assessed for the purpose of the SA. The removal of the development requirement to give consideration to the suitable relocation of the car repairers does not change the existing SA scoring criteria. Therefore it remains no effect for the economy objective. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary for consistency and to improve the effectiveness of the policy. The modifications do not change the general thrust of A1. On this basis, it is considered that there is no change to the SA assessment for this policy.

A2 - Caravan Club

3.2.31 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	/

3.2.32 Proposed modification MM17 results in a number of development requirements being strengthened and more detailed, criterion g) has been deleted with one new development requirement being added. With regard to the proposed deletion of development requirement g), it is considered that this changes the scoring for the economy objective from neutral to negative due to the loss of visitor accommodation for the local tourist economy. The results of the revised SA 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	/

3.2.33 The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary for consistency, to improve the effectiveness of the policy and in response to SDWLP-59 (Environment Agency) and MIQ-96. Whilst the scoring has been amended for the economy objective, it is considered that overall, the modifications do not change the general thrust of site allocation A2.

A3 - Centenary House

3.2.34 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	/

3.2.35 Proposed modification MM19 results in a number of development requirements being strengthened and more detailed with five new development requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary for consistency, to improve the effectiveness of the policy and in response to the Inspector's Initial Question 17 (Ref-IL01), MIQ-98 and MIQ-99. The modifications do not change the general thrust of A3. On this basis, it is considered that there is no change to the SA assessment for this policy.

A4 - Civic Centre, Stoke Abbott Road

3.2.36 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	+

3.2.37 Proposed modification MM20 results in a number of development requirements being strengthened and more detailed with three new development requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary for consistency, to improve the effectiveness of the policy and in response to the Inspector's Initial Question 17 (Ref-IL01). The modifications do not change the general thrust of A4. On this basis, it is considered that there is no change to the SA assessment for this policy.

A5 - Decoy Farm

3.2.38 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	+

3.2.39 Proposed modification MM21 results in the indicative capacity being adjusted from 18,000 sqm to 14,000 sqm employment land. A number of development requirements have

been strengthened and more detailed. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to clarify policy position, to improve the effectiveness of the policy and in response to SDWLP-42 (Lichfields on behalf of GlaxoSmithKline Plc), SDWLP-55 (WSP on behalf of Worthing Borough Council), SDWLP-59 (Environment Agency) and SDWLP-61 (WSCC). The modifications do not change the general thrust of A5. On this basis, it is considered that there is no change to the SA assessment for this policy.

A6 - Fulbeck Avenue

3.2.40 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	/

3.2.41 Proposed modification MM22 results in the indicative capacity being adjusted from 120 units to 152 units. A number of development requirements have been strengthened and more detailed with requirements b), d), e) and i) being deleted. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to clarify policy position, to improve the effectiveness of the policy and in response to SDWLP-59 (Environment Agency) and MIQ-110. The modifications do not change the general thrust of A6. On this basis, it is considered that there is no change to the SA assessment for this policy.

A7 - Grafton

3.2.42 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 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	+	+	?	?	+	++	+

3.2.43 Proposed modification MM23 results in a number of development requirements being strengthened and more detailed and two additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions and in response to SDWLP-59 (Environment Agency) . The modifications are considered necessary to improve the effectiveness of the policy. The modifications do not change the general thrust of A7. On this basis, it is considered that there is no change to the SA assessment for this policy.

A8 - HMRC Offices, Barrington Road

3.2.44 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	++	?	?	-	+	+

3.2.45 Proposed modification MM24 results in a number of development requirements being strengthened and more detailed and three additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy. The modifications do not change the general thrust of A8. On this basis, it is considered that there is no change to the SA assessment for this policy.

A9 - Lyndhurst Road

3.2.46 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 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	+	+

3.2.47 Proposed modification MM25 results in a number of development requirements being strengthened and more detailed with requirement c) being deleted and four additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and to reflect progress made on the site. The modifications do not change the general thrust of A9. On this basis, it is considered that there is no change to the SA assessment for this policy.

A10 - Martlets Way

3.2.48 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	++	+	/

3.2.49 Proposed modification MM26 results in a number of development requirements being strengthened and more detailed with three new additional requirements being added. Development requirement a) has been amended to introduce a new residential element comprising 28 units. It is considered that this results in a change of scoring to objective 11

(Housing) from a neutral effect to a positive effect given that an element of housing has now been introduced. In addition, the scoring for objective 12 (communities) and objective 13 (education) have been amended from having no direct impact on these two objectives to having an 'uncertain' effect as the addition of housing on this site could, without mitigation, increase demand for existing community services. The results of the revised SA appraisal has been 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	+	?	?	++	+	/

3.2.50 The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy.

A11 - Stagecoach, Marine Parade

3.2.51 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 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	+	?	?	+	++	+

3.2.52 Proposed modification MM27 results in a number of development requirements being strengthened and more detailed with requirement d) being deleted and one new additional requirement being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and in response to SDWLP-59 (Environment Agency) and Inspector's Initial

Question 17 (Ref-IL01). The modifications do not change the general thrust of A11. On this basis, it is considered that there is no change to the SA assessment for this policy.

A12 - Teville Gate

3.2.53 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	+	?	?	+	+	+

3.2.54 Proposed modification MM28 results in a number of development requirements being strengthened and more detailed with four additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and in response to SDWLP-59 (Environment Agency). The modifications do not change the general thrust of A12. On this basis, it is considered that there is no change to the SA assessment for this policy.

A13 - Titnore Lane

3.2.55 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	+

3.2.56 The Proposed Modification MM29 seeks to delete the proposed allocation of this site to accord with the Inspectors Post Hearing Advice Letter (IL07) which concluded that the risk of adverse impacts from developing the site would significantly and demonstrably outweigh the benefits. The allocation is therefore not justified or consistent with national policy and therefore no other reasonable alternatives to deleting the allocation were identified. By not allocating this site and amending the Built Up Area Boundary so this site remains outside it, there would be no change from the current baseline and therefore no effects on the sustainability objectives.

A14 - Union Place

3.2.57 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	+	+	?	?	+	++	/

3.2.58 Proposed modification MM30 results in a number of development requirements being strengthened and more detailed with two additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and in response to the Inspector's Initial Question 17 (Ref-IL01). The modifications do not change the general thrust of A14. On this basis, it is considered that there is no change to the SA assessment for this policy.

A15 - Upper Brighton Road

3.2.59 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	+

3.2.60 Proposed modification MM31 seeks amendments pertaining supporting text paragraph 4.43, development requirement n) being deleted along with a number of development requirements being strengthened and more detailed. Three new additional development requirements have been added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and in response to MIQ - 133. The modifications do not change the general thrust of A15. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM1 - Housing mix

3.2.61 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

3.2.62 The changes between the Draft and Submission version of the Policy did not affect the appraisal scoring. The proposed modifications set out in MM32 seek to ensure that the policy is justified, effective and consistent with national policy and none of the changes result in a change to the intention of the policy nor the assessment of it.

DM2 - Density

3.2.63 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	+	+

3.2.64 The changes made to the Policy at Submission stage 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.

3.2.65 Proposed modification MM29 proposes changes to ensure that the policy is effective. The proposed changes do not change the intention of the policy and as such there is no change in the scoring against the objectives in the SA assessment of this policy.

DM3 - Affordable housing

3.2.66 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

3.2.67 This policy as would be expected scored very positively on the housing objective. It also shows a positive effect on the healthy lifestyle objective. On all the other objectives the policy scored as having no impact. The proposed modifications set out in MM35 propose a number of revisions to both supporting text and criteria c) and d). The justification for these modifications is to ensure the policy is effective and complies with the PPG as discussed at the hearing session. The modification to criterion c) introduces clarity as to what the

proposed tenure split of the affordable homes delivered needs to be on a qualifying site. The modification to criterion d) reintroduces a threshold (now 3%) for the number of affordable homes that need to be provided. It is not considered that these proposed modifications change the thrust of the policy and its assessment against the SA objectives.

DM4 - Gypsy, traveller & travelling showpeople

3.2.68 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	+

3.2.69 The appraisal showed that there was no change in the scoring of the Draft and Submission Draft versions of the policy. Proposed modification MM31 seeks to delete criterion b) and amend criterion c) and the changes are being proposed to avoid unnecessary wording and to ensure the policy is effective. It is not considered that the proposed modifications will result in any change to the impact of the policy on the objectives.

DM5 - Quality of the built environment

3.2.70 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	+

3.2.71 Proposed modification MM37 seeks a number of amendments pertaining to supporting text paragraphs 5.59, 5.64, 5.72 and 5.73. The proposed amendments to the supporting text have been made as a result of the discussions held during hearing sessions and to ensure that the supporting text is in accordance with the revised NPPF. Modifications have been made to criterion a) ii), a) iv), a) viii), a) ix) and c). An additional criterion (d) has been added. These amendments have been made to improve the effectiveness of the policy.

The proposed modifications do not change the general thrust of Policy DM5 therefore it is considered that there is no change to the SA assessment for this policy.

DM6 - Public realm

3.2.72 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	?	++	+

3.2.73 Proposed modification MM38 seeks a number of amendments pertaining criterion a), c), e) and f) to improve the clarity and effectiveness of the policy (as discussed during the hearing session) as well as responding to the representation received from the British Sign & Graphics Association (SDWLP-20). The modifications do not change the general thrust of policy DM6 and therefore it is considered that there is no change to the SA assessment for this policy.

DM7 - Open space, recreation & leisure

3.2.74 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	+

3.2.75 Proposed modification MM39 seeks a number of amendments pertaining supporting text paragraphs 5.100 and 5.101. In addition, criterion a), b), c) iii) have been amended with criterion e) deleted. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing session and in

response to MIQ-188. The proposed modifications do not change the general thrust of Policy DM7 therefore it is considered that there is no change to the SA assessment for this policy.

DM8 - Planning for sustainable communities / community facilities

3.2.76 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	+

3.2.77 Following changes for the Submission version the policy scored more positively against Objective 12 Communities as having very positive effects recognising that the policy would protect and support improvements to a range of community facilities. Whereas the score against Objective 14 Economy had changed from positive to no effect recognising that the types of facilities and services this policy is likely to support were unlikely to have a significant effect in terms of job creation. The proposed modifications set out at MM35 are primarily required to ensure that the policy is effective and for clarity. As such the intention of the policy remains the same and the assessment does not change.

DM9 - Delivering infrastructure

3.2.78 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	+

3.2.79 Proposed modification MM41 seeks a number of amendments pertaining supporting text paragraphs 5.115 & 5.123. In addition, criterion c) has been amended. An additional criterion (f) has been added. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions and

in response to MIQ-155 and MIQ-156. The amendments are considered necessary to improve the effectiveness of the policy. The proposed modifications do not change the general thrust of Policy DM9 therefore it is considered that there is no change to the SA assessment for this policy.

DM10 - Economic growth and skills

3.2.80 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	?	-	+	+	++	+	+

3.2.81 The Submission Draft version of the policy scored 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 was due to the recognition that given the lack of available land the provision of new employment floorspace was likely to be at the expense of housing delivery.

3.2.82 There are no proposed changes to this policy, only a factual update in the supporting text to the policy, therefore there is no change to the assessment.

DM11 - Protecting and enhancing employment sites

3.2.83 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	++	+	+

3.2.84 This version of the Policy scored 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.

3.2.85 The proposed changes to the policy set out in main modification MM38 seek to improve the effectiveness of the policy and ensure matters are not deferred to an SPD. The changes do not change the primary purpose of the policy and as such there is no change to the scoring against the SA objectives.

DM12 - The visitor economy

3.2.86 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

3.2.87 There were no changes in the appraisal scoring between the DWLP and the Submission policy versions of the policy. The proposed modification as set out in MM39 seeks to improve the effectiveness of the policy but does not change the primary purpose of the policy and as such there are no changes to the assessment of the policy.

DM13 - Retail and town centre uses

3.2.88 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. Therefore no reasonable alternatives have been identified.

3.2.89 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	+	++	+

3.2.90 The changes to the Policy did not result in any difference in the appraisal scoring between the Draft and Submission versions of the policy. The proposed modifications MM40 whilst setting out a number of changes these primarily seek to ensure that the policy is effective, justified, consistent with national policy and to improve its effectiveness. None of the proposed changes impact on the primary purpose of the policy and as such there are no changes to the assessment of the policy.

DM14 - Digital infrastructure

3.2.91 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

3.2.92 This Submission 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. The proposed modifications set out in MM41 do not alter the purpose and objectives of the policy but rather seek to ensure that the policy is clear and effective. As such there is no change in the assessment of this policy.

DM15 - Sustainable transport & active travel

3.2.93 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	+	+	++

3.2.94 Proposed modification MM47 seeks an amendment pertaining supporting text paragraph 5.233. In addition criterion a) iv), a) vii), a) viii) and b) viii) have been amended with criterion b) v) deleted. An additional criterion b) viii) has been added. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing session and in response to the Inspector's Initial Questions 27 & 28 and also to ensure consistency with the revised NPPF. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM15. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM16 - Sustainable design

3.2.95 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

3.2.96 Proposed modification MM48 seeks amendments pertaining criterion a) b), c) and f). The proposed amendments to the policy criteria have been made as a result of the discussions held during the hearing sessions and in response to MIQ-174. The modifications seek to ensure that the residential policy requirements are consistent with the 2015 Written Ministerial Statement and non-residential requirements are consistent with the emerging future buildings standard. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM16. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM17 - Energy

3.2.97 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

3.2.98 Proposed modification MM49 seeks an amendment pertaining criterion c). The proposed amendment to the policy criterion has been made as a result of the discussions held during the hearing sessions and to ensure consistency with the modifications made to Policy DM16. The modification is considered necessary for effectiveness to ensure that the policy is not overly prescriptive but they do not change the general thrust of Policy DM17. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM18 - Biodiversity

3.2.99 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

3.2.100 Proposed modification MM50 seeks an amendment pertaining supporting text paragraph 5.259. In addition criterion f) and h) have been amended. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions and in response to MIQ-192 and the representation received from Sussex Wildlife Trust (SDWLP-57). The modifications also seek to ensure that the policy and supporting text reflect the Royal Assent of the Environment Act and Local Nature Strategies. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM18. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM19 - Green infrastructure

3.2.101 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	+

3.2.102 Proposed modification MM51 seeks amendments pertaining to supporting text paragraphs 5.271 and 5.277. In addition criterion a), b) and c) have been amended. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM19. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM20 - Flood risk and sustainable drainage

3.2.103 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. 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

3.2.104 Proposed modification MM52 seeks amendments pertaining to supporting text paragraphs 5.280 and 5.282. In addition, criterion a), b) iii), c) i) and d) have been amended with new additional criterion c) ii) and c) vi). The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions, in response to the revised NPPF, in response to SWDLP-13 and in response to MIQ-181 and MIQ-182. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM20. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM21 - Water quality and sustainable drainage

3.2.105 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

3.2.106 Proposed modification MM53 seeks amendments pertaining criterion b) and e). The proposed amendments to the policy criteria have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy, ensure it is consistent with national policy and in response to MIQ-184. The modifications do not change the general thrust of Policy DM21. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM22 - Pollution

3.2.107 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

3.2.108 Proposed modification MM54 seeks amendments pertaining supporting text paragraph 5.313 and policy criterion a), b), d) and e). The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy, ensure it is consistent with the NPPF and new guidance and also in response to a representation received from SDWLP-60 (Rapleys on behalf of EM Goring Ltd). The modifications do not change the general thrust of Policy DM22. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM23 - Strategic approach to the historic environment

3.2.109 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

3.2.110 Proposed modification MM55 seeks an amendment pertaining policy criterion b) ii). The proposed amendment has been made as a result of the discussions held during the hearing sessions. The modification is considered necessary to improve the effectiveness of the policy and does not change the general thrust of Policy DM23. On this basis, it is considered that there is no change to the SA assessment for this policy.

DM24 - The historic environment

3.2.111 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:

DM24 - 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	0	0

3.2.112 Proposed modification MM56 seeks amendments pertaining supporting text paragraph 5.328 and policy criterion c) and g) with criterion i) being deleted. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy, ensure it is consistent with the NPPF and in response to MIQ - 171. The modifications do not change the general thrust of Policy DM24. On this basis, it is considered that there is no change to the SA assessment for this policy.

3.3 Cumulative Impacts

3.3.1 The SEA Directive requires an assessment of additional impacts in addition to direct impacts arising from individual policies. These are specified as “secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative”. The policy appraisals incorporated consideration of various effects.

3.3.2 As some of the assessments have resulted in a change to scores, the total and cumulative effects of Local Plan policies against the SA objectives need to be reconsidered at this stage. This section only considers the impacts against the following objectives, as these are the only objectives for which any of the scores have changed:

- Objective 1 Environmental Quality
- Objective 2 Biodiversity
- Objective 8 Historic Environment
- Objective 9 Healthy Lifestyles
- Objective 11 Housing
- Objective 12 Communities
- Objective 13 Education
- Objective 14 Economy

SA Objective 1. Environmental Quality																																																	
LP Part 2		LP Part 3						LP Part 4														LP Part 5																											
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24			
+	+	-	-	0	/	0	/	-	?	?	?	?	?	?	?	?	?	?	?	?	?	?	-	0	0	0	+	+	0	0	0	+	0	0	0	0	0	+	0	/	+	+	/	+	+	+	+	0	0
Conclusions - SA								Policies within the spatial strategy - part 3, and site allocations - part 4 of the Plan score as having predominantly negative and neutral or negative and uncertain effects, recognising the potential for development, especially those sites in close proximity to the AQMA, to increase traffic negatively impacting on air quality. This is balanced by strategic policies - part 2 and development management policies - part 4 of the Plan which provide mitigation and therefore score positively with very significant positive effects recorded against policies DM21 and DM22 reflecting the intention of these policies to protect and enhance the natural environment.																																									
Conclusions - HIA / EqIA								This objective has no direct relationship with the HIA / EqIA.																																									

Cumulative (including synergistic) Effects	<p>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 within the Local 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.</p>
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SA Objective 2. Biodiversity																																														
LP Part 2		LP Part 3						LP Part 4										LP Part 5																												
S	S	S	S	S	S	S	S	A	A	A	A	A	A	A	A	A	A	A	A	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D					
P	P	S	S	S	S	S	S	1	2	3	4	5	6	7	8	9	0	1	2	3	4	1	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24

SA Objective 8. Historic Environment																																																
LP Part 2		LP Part 3						LP Part 4										LP Part 5																														
SP2	PP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24	DM25	
?	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 - SA		Policies in Part 5 of the Plan - development management policies, that relate to the historic environment score as having very significant positive effects. However the policies for site allocations in Part 4 which contain or are located close to heritage assets score negatively although it is acknowledged that some could result in an improvement in their setting. Some of the Spatial Strategy Policies (Part 3) that relate to landscape and character also score positively due to protection of historic views between settlements, highlighting a link between this and the landscape & character objective.																																														
Conclusions - HIA / EqIA		This objective has no relationship with the HIA / EqIA.																																														
Cumulative (including		The number of heritage assets at risk has decreased over recent years. The Local Plan should preserve and enhance the historic environment.																																														

synergistic) Effects	
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SA Objective 9. Healthy Lifestyles																																															
LP Part 2		LP Part 3						LP Part 4										LP Part 5																													
S	S	S	S	S	S	S	S	A	A	A	A	A	A	A	A	A	A	A	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D									
P	P	S	S	S	S	S	S	1	2	3	4	5	6	7	8	9	0	1	1	2	3	4	5	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
+	+	+	+	?	+	0	+	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	/	/	+	+	+	+	0	0	0	0	0	+	+	0	?	+	+	+	+	0	0
+											+																																				
Conclusions - SA								All parts of the Plan score positively against this objective with very significant positive effects identified in relation to Policies SP3 which directly relates to the health of communities, A4 which allocates land for a new integrated health hub and DM7 which aims to protect and enhance open space, sport and recreation facilities. Part 5 of the Plan (development management policies) scores positively overall across a range of economic, social and environment policies reflecting the wide determinants of health.																																							

Conclusions - HIA / EqlA	<p>Policies in Part 3 of the Plan all score positively with regards to healthy lifestyles. It is considered that these will enable the protection of valued open spaces, green spaces and safeguarding of leisure uses which will help to promote opportunities for exercise and recreation thereby supporting the health of local communities. This will also support EqlA protected characteristics such as 'age', 'disability', 'race'. Policies SP3 and DM7 most relevant to this objective given that they are both health related policies and will help to address the wider determinants of health as well as encouraging healthy lifestyles. The policies will also support EqlA protected characteristics.</p>
Cumulative (including synergistic) Effects	<p>Pockets of Worthing suffer with deprivation in relation to health. 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. The Local Plan will also support this effort to reduce inequalities.</p>

SA Objective 11. Housing																																																		
LP Part 2		LP Part 3						LP Part 4														LP Part 5																												
S	S	S	S	S	S	S	S	A	A	A	A	A	A	A	A	A	A	A	A	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D						
P	P	S	S	S	S	S	S	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M	M		
2	3	1	2	3	4	5	6													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	M	M	M	M	M		
+	+	+	+	+	-	-	-	+	+	+	/	0	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
					-	-	-	+	+					+	+					+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Conclusions - SA								This objective receives mixed scores reflecting the need for competing demands for land in a constrained area. Part 2 of the Plan (strategic policies) scores positively however part 3 (spatial strategy) has mixed scores with very significant negative effects identified as a result of protecting countryside, local gaps and local green spaces from development (SS4, SS5, SS6). This is balanced against Part 4 (site allocations) which scores as having very significant positive effects due to the contribution the sites will make to the delivery of new homes, again this balanced against the need for some sites to provide other uses. Within Part 5 (development management policies) those sites that directly relate to the delivery of housing score as having very significant positive effects whereas those policies that seek to protect and maximise other uses score negatively.																																										
Conclusions - HIA / EqIA								It is considered that the provision of high quality homes will help to address local housing need and thereby support EqIA protected characteristics ‘age’, ‘disability’ and ‘race’.																																										

Cumulative (including synergistic) Effects	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 for local residents to find suitable accommodation.
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SA Objective 12. Communities																																																		
LP Part 2		LP Part 3						LP Part 4										LP Part 5																																
S	S	S	S	S	S	S	S	S	A	A	A	A	A	A	A	A	A	A	A	A	A	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D				
P	P	S	S	S	S	S	S	S	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40		
?	+	+	?	+	0	0	+	?	?	+	+	0	?	?	?	?	?	?	?	?	+	0	0	/	0	0	+	+	+	+	0	0	+	+	+	+	0	0	+	+	+	+	0	0	0	?	+	0	0	0
	+						+			+	+																																							
Conclusions - SA								There are very significant positive effects identified against this objective with Policies SP3, SS6, A3, A4 and DM8 due to the new or enhanced community facilities and services they will provide. A number of policies score as uncertain recognising that development may place pressure on existing community facilities and services.																																										

Conclusions - HIA / EqlA	Many of the development management policies in part 5 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 (including synergistic) Effects	Data suggests that people live 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 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.

SA Objective 13. Education																																															
LP Part 2		LP Part 3						LP Part 4										LP Part 5																													
S P 2	S P 3	S S 1	S S 2	S S 3	S S 4	S S 5	S S 6	A 1	A 2	A 3	A 4	A 5	A 6	A 7	A 8	A 9	A 10	A 11	A 12	A 13	A 14	A 15	D M 1	D M 2	D M 3	D M 4	D M 5	D M 6	D M 7	D M 8	D M 9	D M 10	D M 11	D M 12	D M 13	D M 14	D M 15	D M 16	D M 17	D M 18	D M 19	D M 20	D M 21	D M 22	D M 23	D M 24	
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 - SA	A number of policies score as uncertain recognising that development may place pressure on existing education facilities. This is addressed through Part 5 of the Plan where policies DM8, DM9, DM10 will protect and support the provision of new education and training facilities.
Conclusions - HIA / EqIA	Policies DM8, DM9, DM10 will protect and support the provision of new education and training facilities and thereby support EqIA protected characteristics 'age', 'disability' and 'race'.
Cumulative (including synergistic) Effects	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 Local Plan will protect existing and support the provision of new education and training facilities

SA Objective 14. Economy																																																	
LP Part 2		LP Part 3						LP Part 4										LP Part 5																															
S P 2	S P 3	S S 1	S S 2	S S 3	S S 4	S S 5	S S 6	A 1	A 2	A 3	A 4	A 5	A 6	A 7	A 8	A 9	A 10	A 11	A 12	A 13	A 14	A 15	A 16	D 1	D 2	D 3	D 4	D 5	D 6	D 7	D 8	D 9	D 10	D 11	D 12	D 13	D 14	D 15	D 16	D 17	D 18	D 19	D 20	D 21	D 22	D 23	D 24		
?	+	+	+	+	+	-	-	-	0	-	+	?	+	0	+	-	0	+	+	+		+	0	0	0	0	0	0	0	?	0	0	0	+	+	++	+	+	+	+	0	0	0	0	0	0	0	+	0
					+					+		+					+																	+	+														
Conclusions - SA								The Plan has mixed scores against this objective reflecting the competing demands of delivering housing and employment floorspace in a constrained authority. Those sites and policies throughout the Plan that aim to support economic growth, regeneration and protect employment sites score as having very significant positive effects.																																									
Conclusions - HIA / EqIA								Policy SP3 seeks to improve the provision of and / access to employment in recognition of the clear links between income and health. This will support the EqIA protected characteristics ‘age’, ‘disability’ and ‘race’.																																									
Cumulative (including								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																																									

synergistic) Effects	or expanding businesses. However despite the Local Plan there may still be a loss of offices as a result of Permitted Development Rights.
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4.0 Conclusions

4.1 Appraisal Findings

4.1.1 The appraisals of the Main Modifications show changes in the scoring of 6 policies against the sustainability objectives. These are:

- SP2 Climate Change
- SS3 Town Centre
- SS5 Local Green Gaps
- SS6 Local Green Spaces
- A2 Caravan Club
- A10 Martlets Way

4.1.2 In addition it should be noted that the deletion of allocation A13 Titnore Lane will alter the total effects of the Local Plan as those effects that were associated with this allocation will no longer apply.

4.1.3 The conclusions of these re-appraisals are set out above. No alternatives have been put forward to the proposed modifications as they are being proposed in order to ensure legal compliance and soundness. The do-nothing option is not considered a reasonable alternative at this stage, particularly in relation to those relating to changes to national planning policy. No additional mitigation is proposed as a result of the Proposed Modifications.

4.1.4 As some of the re-appraisals resulted in a change to scores, the total and cumulative effects of Local Plan policies against the following SA Objectives were reconsidered:

- Objective 1 Environmental Quality
- Objective 2 Biodiversity
- Objective 8 Historic Environment
- Objective 9 Healthy Lifestyles
- Objective 11 Housing
- Objective 12 Communities
- Objective 13 Education
- Objective 14 Economy

4.1.5 This demonstrated that although some of the appraisals have changed, the cumulative impacts arising from the implementation of the Worthing Local Plan (with proposed modifications) are not considered to be significantly different to those identified at Publication stage.

4.1.6 No changes to monitoring are proposed. Monitoring measures are set out in the Submission SA Report (2021).

4.2 Next Steps

4.2.1 This SA Addendum will be available for consultation alongside the proposed modifications. Any representations received will be sent to the Inspector for their consideration.

Appendix 1 Re-appraisal Following Main Modifications

Objective	SP2 Climate Change
1. Environmental Quality	+
	The policy aims to reduce carbon emissions and maximise carbon sequestration which will likely also indirectly result in improvements to air quality. Increased use of SuDS to adapt to climate change and reduce vulnerability to flooding may also help improve water quality through filtering.
2. Biodiversity	++
	By taking a strategic and integrated approach to climate change this policy is likely to support increased planting and provision of Green Infrastructure to provide carbon sequestration. Proposed modification MM3 seeks to introduce a new criterion (k) to ensure that development must not compromise land that is required to deliver towards a nature recovery network. This has resulted in the assessment being revised from positive to very positive significant effects.
3. Land and Soils	0
	This policy would have no intentional impact on land and soils
4. Energy	++
	This policy aims to provide a strategic and integrated approach to addressing climate change which will support the commitment of achieving zero carbon emissions.
5. Water Management	++
	The strategic approach to climate change provided by this policy will also help to improve the resilience of local communities to climate change including the effects of drought and increased rainfall
6. Landscape and Character	0
	It is not expected that this policy will have any impact on landscape or character
	+

7. Built Environment	Whilst this policy doesn't intend to affect the built environment, indirectly the provision of Green Infrastructure, planting and SuDS schemes to help manage the effects of climate change may contribute to an improved public realm.
8. Historic Environment	<p>?</p> <p>This policy takes a strategic approach to climate change and is unlikely to affect the historic environment.</p>
9. Healthy Lifestyles	<p>+</p> <p>Having a strategic approach to climate change will help improve resilience and adaptation of communities to the effects of climate change. This could also help to reduce inequalities as it is recognised that the most disadvantaged are usually the most affected by climate change.</p>
10. Crime and Public Safety	<p>0</p> <p>It is not expected that this policy will have any impacts on crime and public safety.</p>
11. Housing	<p>+</p> <p>Having a strategic approach to climate change will support the delivery of high quality sustainable homes that are efficient to heat and help improve resilience to heatwaves, increased flooding and other effects of climate change.</p>
12. Communities	<p>?</p> <p>The policy seeks to provide a strategic and integrated approach to climate change which will help prioritise adaptation measures that improve the resilience of communities, reduce inequality and bring a range of social benefits. However it is important that climate change mitigation and adaptation do not disproportionately affect more deprived communities.</p>
13. Education	<p>0</p> <p>This policy would have no impact on education facilities</p>
14. Economy	<p>?</p> <p>Improving the resilience of communities and adaptation measures will help minimise the economic impact from the effects of climate change such as flooding and drought. However the transition to a low carbon economy is likely to have an economic cost.</p>

15.Town and Local Centres	0
	it's not expected that this policy will impact on town and local centres.
16.Travel and Access	+
	A strategic approach to climate change through supporting a reduction in carbon emissions may also help to promote more sustainable and active modes of transport.
Mitigation	<p>This or more detailed climate change policies need to recognise the potential conflict with preservation of the historic environment, particularly in relation to Listed Buildings.</p> <p>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.</p>
Conclusions	<p>This policy has mostly positive scores especially in relation to energy and water management which are both directly impacted by climate change mitigation and adaptation. There are some uncertain scores relating to the impact of measures on the historic environment, communities and the economy. Mitigation has been suggested to recognise potential compatibility issues with the historic environment and the importance of climate justice. It is considered that proposed modification MM3 results in a change to objective 2 and subsequently the scoring has been revised from positive to very positive significant effects in recognition of the new criterion providing an extra policy test seeking to protect the borough's natural capital and biodiversity assets.</p>

Objective	SP3: Healthy Communities
1. Environmental Quality	+
	Pollution negatively impacts health so a strategic policy that seeks to improve people's health may in turn improve environmental quality.
2. Biodiversity	+
	A high quality natural environment that supports biodiversity is also likely to help support people's wellbeing. Open spaces should be managed to enhance biodiversity.

3. Land and Soils	0
	This policy would have no intentional impact on land and soils
4. Energy	?
	This strategic policy intends to support healthy lifestyles. The transition to zero carbon is likely to result in more energy efficient homes which may help to address fuel poverty and help ensure homes are warm.
5. Water Management	+
	Adapting to the effects of climate change and improving resilience are important in ensuring people's health, reducing inequalities and social justice.
6. Landscape and Character	0
	It is not expected that this policy will have any impact on landscape or character
7. Built Environment	?
	A high quality public realm may help improve a sense of wellbeing
8. Historic Environment	0
	This policy would have no direct impact on the historic environment
9. Healthy Lifestyles	++
	This strategic policy seeks to support and improve people's health through the delivery of healthy places and services.
10. Crime and Public Safety	+
	Crime and fear can negatively impact on a person's health and wellbeing. This policy should therefore support measures that also seek to improve safety and reduce the fear of crime.
11. Housing	+
	High quality appropriate housing that meets the needs of local people is important to support healthy lifestyles and wellbeing.
	++

12. Communities	Many of the measures that help support healthy lifestyles such as high quality open space and opportunities for recreation and active travel as well as opportunities for food growing will also help create and support vibrant communities.
13. Education	0
	This policy would have no impact on education facilities
14. Economy	+
	This policy seeks to improve the provision of and / access to employment in recognition of the clear links between income and health.
15. Town and Local Centres	0
	It's not expected that this policy will impact on town and local centres.
16. Travel and Access	++
	A strategic policy that supports healthy lifestyles will also support active travel.
Mitigation	To maximise positive effects the policy should make reference to fuel poverty, and more generally the need to address inequalities and climate justice.
Conclusions	This policy scores positively across almost all objectives. There are a number of uncertain effects identified as the outcomes will depend on how the policy is implemented. Mitigation has been identified to further strengthen the positive effects. Proposed modification MM4 seeks a number of amendments pertaining supporting text paragraphs 2.26, 2.36 and 2.37. In addition, criterion a) has been amended to merge with criterion b). The proposed amendments have been made as a result of the discussions held during the hearing session and in response to MIQ-24. It is considered that criterion a) doesn't aid implementation of the policy and thus reference to the Public Health Strategy is strengthened within supporting text 2.26. Supporting text 2.36 has been strengthened to provide clarity on how the Health Impact Assessment will be applied. The proposed modifications do not change the general thrust of policy SP3 therefore it is considered that there is no change to the SA assessment for this policy.

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Objective	SS1 Spatial Strategy
1. Environmental Quality	- New development is likely to worsen air quality as a result of increased traffic generated by development. Other policies in the Plan seek to mitigate this impact.
2. Biodiversity	/ 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.
3. Land and Soils	+ The policy sets out how development will be managed including the need to make efficient use of previously developed land and protecting open spaces, countryside and gaps.
4. Energy	- 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
5. Water Management	- The provision of new development is likely to increase demand for water. Other policies in the Plan seek to mitigate this impact.
6. Landscape and Character	+ The policy protects valued landscapes including important gaps between settlements and the undeveloped coastline.
7. Built Environment	+ 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 its surrounding context. Proposed modification MM5 revises criterion a) of the policy to ensure that the local plan will 'deliver high quality development'
8. Historic Environment	0 This policy doesn't directly impact the historic environment, however it is recognised that the development of individual sites may. This is addressed through other policies in the Plan.

9. Healthy Lifestyles	+
	The protection of valued open spaces and safeguarding of leisure uses will help promote opportunities for exercise and recreation supporting healthy lifestyles
10. Crime and Public Safety	0
	This policy won't directly impact on crime and public safety, however it is recognised that the development of individual sites may. This is addressed through other policies in the Plan.
11. Housing	+
	This policy seeks to manage delivery of new development including housing. It seeks to increase the rate of housing delivery from small sites and allocate new sites for housing. However this is limited by the protection of valued open spaces and landscapes and the safeguarding of sites currently used for other uses.
12. Communities	+
	The policy seeks to provide for the needs of local communities.
13. Education	/
	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.
14. Economy	+
	This policy seeks to safeguard existing employment sites and supports delivery of wider regeneration objectives particularly in the town centre and seafront which will benefit the local economy.
15. Town and Local Centres	+
	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.
16. Travel and Access	?
	It is unclear what the impact of this policy will have on access to sustainable modes of transport.

Mitigation	Most potential negative effects could be addressed through other policies in the Plan these should: promote active travel, require net gains in biodiversity, support transition to zero carbon development, ensure sustainable use of water resources, protect and conserve the historic environment.
Conclusions	This policy scores mostly positively reflecting the balance it seeks to achieve between maximising housing delivery and protecting important open spaces and the needs of local communities which will also support EqIA protected characteristics such as 'age', 'disability', 'race'. There are a number of negative and neutral scores mostly relating to environmental objectives due to the potential impacts of development. Mitigation has been suggested to ensure these are addressed by other policies in the Plan. It is considered that proposed modification MM5 does not alter the assessment of any of the criteria nor the final conclusion of this policy.

Objective	SS2 Site Allocations
1. Environmental Quality	- The intention of this policy is to allocate land for development. Depending on how development comes forward will determine the environmental impact. However it is likely that this scale of development without mitigation will result in increased traffic which could negatively impact on air quality.
2. Biodiversity	- The intention of this policy is to allocate land for development. Depending on how development comes forward without mitigation this could result in a loss of habitats, species and/or wildlife corridors especially on greenfield sites.
3. Land and Soils	+ The intention of this policy is to allocate land for development. This involves a mix of brownfield and greenfield sites.
	-

4. Energy	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.
5. Water Management	-
	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.
6. Landscape and Character	?
	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.
7. Built Environment	0
	The intention of this policy is to allocate sites for development. This policy does not set out how developments should be designed.
8. Historic Environment	?
	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.
9. Healthy Lifestyles	+
	The intention of this policy is to allocate sites for development this includes where some specific sites will be expected to provide leisure uses and healthcare facilities which will help support healthy lifestyles.
10. Crime and Public Safety	?
	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.
11. Housing	+
	The delivery of the amounts of new housing specified will go some way to meet local need. However it is recognised that the level of development set out by this policy falls significantly below the levels of housing need identified.
	?

12. Communities	It is unclear what the impact of the site allocations set out 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.
13. Education	?
	It is unclear what the impact of the site allocations set out in this policy will be on the provision and accessibility of education facilities and skills or training facilities.. The infrastructure required to support development is outlined elsewhere in the Plan.
14. Economy	+
	The levels of development specified in this policy include a minimum level of employment and commercial floorspace.
15. Town and Local Centres	+
	The levels of development specified in this policy include an indicative amount of commercial (retail and leisure) floorspace to be provided which will support the vitality and viability of the town centre.
16. Travel and Access	?
	It is unclear what impact the site allocations specified in this policy will have on access to sustainable modes of transport.
Mitigation	Most potential negative effects are against environmental objectives and will be mitigated through other policies in the Plan. It is recommended that to maximise positive effects 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.

Conclusions	<p>This policy scores positively in relation to town centres, economy, housing and healthy lifestyles recognising how the allocations will contribute to helping meet local development needs. However it also needs to be recognised that despite the allocations there is still a significant shortfall. Mitigation has been identified to increase these positive effects by further maximising delivery of housing and employment floorspace through the inclusion of minimum density requirements.</p> <p>The infrastructure required to support development is outlined elsewhere in the Plan as are policies that promote well designed and inclusive public spaces, and protect and enhance the environment. This will provide opportunities for health and wellbeing as well as supporting EqIA protected characteristics.</p> <p>The Proposed Modification MM29 seeks to delete the Titnore Lane site the proposed allocation of this site to accord with the Inspectors Post Hearing Advice Letter (IL07) which concluded that the risk of adverse impacts from developing the site would significantly and demonstrably outweigh the benefits. The allocation is not justified or consistent with national policy. Whilst the removal of the site reduces the overall proposed supply of housing by 60 dwellings it is not considered that this results in a change to the overall thrust of the policy and of the assessment of the policy against the SA objectives.</p>
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Objective	SS3 Town Centre
1. Environmental Quality	<p>0</p> <p>There are no clear links between this policy and environmental quality.</p>
2. Biodiversity	<p>0+</p> <p>There are no clear links between this policy and biodiversity. Proposed modification MM7 proposes the introduction of a new criterion ' g) As part of the development of the Green Infrastructure Strategy the Council will consider opportunities to integrate biodiversity within the town centre to address climate adaptation and ecological connectivity' . This has resulted in the assessment being revised from a no likely effect to a positive effect.</p>
3. Land and Soils	<p>+</p> <p>Having a policy that sets the spatial strategy for the town centre will help ensure development on key regeneration sites is maximised and makes the most effective use of land.</p>

4. Energy	0
	This policy would have no impact on energy use
5. Water Management	0
	There are no clear links between this policy and water management. However enhanced public spaces and regeneration schemes will present opportunities for SuDS schemes to manage surface water runoff more sustainably. This is addressed through other policies in the Plan.
6. Landscape and Character	+
	This policy sets out the spatial strategy for the town centre which aims to better integrate the town centre and seafront.
7. Built Environment	+
	This policy sets out the spatial strategy for the town centre which should have a positive impact on the quality of the built environment in and around the town centre. This should be further strengthened in the policy through wording to support high quality design and improved public spaces.
8. Historic Environment	0
	There is no direct link between this policy and the historic environment. This will be addressed through other policies in the Plan.
9. Healthy Lifestyles	?
	This policy sets the spatial strategy for the town centre. Enhanced public spaces, new leisure uses and improved linkages to the seafront and other walking and cycling routes may help improve people's health and wellbeing.
10. Crime and Public Safety	+
	This policy sets out the spatial strategy for the town centre. It is likely that an improved mix of uses could help improve visitor numbers and decrease vacant stores, decreasing the likelihood of crime and anti social behaviour.
	+

11. Housing	The policy sets the spatial strategy for the town centre. This makes reference to residential within the mix of uses being encouraged. This will help contribute to meeting the local housing need. However the sites that are allocated and the scale and type of development on these are addressed through other policies in the Plan.
12. Communities	+
	This policy sets the spatial strategy for the town centre which aims to improve the quality of the public realm and encourages new community facilities which should help support those living in and around the town centre.
13. Education	0
	There are no direct links between this policy and education
14. Economy	++
	This policy sets the spatial strategy for the town centre. A key aim of this policy is to strengthen the sub-regional role of the town centre which will help support the local economy and attract inward investment.
15. Town and Local Centres	++
	This policy sets out the spatial strategy for the town centre to strengthen its role, improve the mix of uses and enhance the quality of the town centre as a destination.
16. Travel and Access	+
	This policy sets out the spatial strategy for the town centre which includes public realm improvements, better linkages with the seafront and improved pedestrian cycle and public transport routes and facilities.
Mitigation	Positive effects could be further maximised through incorporation of wording to enhance/improve linkages between the town centre and seafront, and support high quality public spaces.

Conclusions	This policy scores positively against most objectives. It scores very positively against economy and town centre objectives which would be expected given that these are the key issues the policy is seeking to address. It is considered that proposed modification MM7 results in a change to objective 2 and subsequently the scoring has been revised for no effect to positive in recognition of the new criterion which seeks to consider opportunities to integrate biodiversity within the town centre to address climate change and ecological connectivity.
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Objective	SS4 Countryside and Undeveloped Coast
1. Environmental Quality	/
	This policy would help protect the countryside and undeveloped coast however it is unlikely to have any impact on environmental quality from the baseline.
2. Biodiversity	+
	This policy would conserve and protect habitats located on land outside the Built Up Area Boundary. These positive effects could be further maximised through policy wording that seeks to improve and enhance biodiversity or green infrastructure.
3. Land and Soils	+
	This policy would protect areas of the best and most versatile agricultural land located outside of the Built Up Area Boundary
4. Energy	0
	This policy would have no impact on energy use
5. Water Management	0
	This policy would have no impact on water management
	+

6. Landscape and Character	This policy would preserve and protect the character of the countryside and undeveloped coastline by preventing inappropriate development.
7. Built Environment	0
	This policy would have no impact on the quality of the townscape or securing high quality design
8. Historic Environment	0
	This policy would have no direct impact on the historic environment
9. Healthy Lifestyles	+
	This policy supports recreation uses and enhanced access for pedestrians, cyclists, equestrians and those with mobility difficulties
10. Crime and Public Safety	0
	This policy would have no impact on crime and public safety
11. Housing	- -
	This policy would restrict delivery of housing in the remaining areas of open space limiting the ability to meet the identified housing need for the local area.
12. Communities	0
	This policy would have no impact on communities
13. Education	0
	This policy would have no impact on education facilities
14. Economy	-
	This policy would restrict development including potential new employment floorspace within areas designated as countryside
15. Town and Local Centres	0
	This policy would have no impact on town or local centres

16.Travel and Access	+
	This policy would enhance pedestrian, cycle and equestrian access. Policy wording that promotes enhanced access for those with mobility difficulties will also support EqIA protected characteristics.
Mitigation	<p>The appraisal has identified that the positive effects associated with biodiversity could be further maximised by policy wording to improve and enhance green infrastructure.</p> <p>Policy wording that promotes enhanced access for pedestrians, cyclists equestrians and those with mobility difficulties will also maximise positive effects associated with travel and health objectives and support EqIA protected characteristics</p>
Conclusions	<p>The policy scores as having very significant negative effects against the housing objective and to a lesser extent also the economy objective. This reflects how by protecting these areas most types of development will be restricted further reducing the land available to provide housing and reduce the shortfall in meeting local needs. This is balanced against positive effects for the biodiversity, land and soils, landscape, health and travel objectives.</p> <p>Proposed modifications MM8 seek to amend three of the criteria to ensure that they reflect Para 176 of the NPPF and to ensure consistency and conformity with National Policy. Revised criterion a) now clarifies that land outside the BUAB - excluding sites designated as Local Green space under SS6 will be defined as 'countryside and coast'. Revised criterion b) clarifies that applications for the development of entry level exception sites will be supported subject to specific criteria and revised criterion f) requires any development within the setting of the National Park should avoid or minimise any adverse impact on the designated areas.</p>

Objective	SS5 Local Green Gaps
1. Environmental Quality	0
	This policy would not have any direct effect on environmental quality or pollution.
	0

2. Biodiversity	This policy seeks to prevent coalescence and maintain the identity of settlements. However by excluding those sites designated as Local Green Space those spaces most valued including for their biodiversity would no longer be protected by this policy.
3. Land and Soils	+
	This policy would protect areas of the best and most versatile agricultural land located within the Local Gaps
4. Energy	0
	This policy would have no impact on energy use
5. Water Management	0
	This policy would have no impact on water management
6. Landscape and Character	++
	This policy aims to preserve and protect the character and landscape setting of local settlements by preventing coalescence
7. Built Environment	0
	This policy would have no impact on the quality of the townscape or securing high quality design
8. Historic Environment	+
	This policy would prevent coalescence preserving historic settlement patterns and views between settlements.
9. Healthy Lifestyles	0
	This policy would ensure some open space is preserved between settlements. However by excluding those areas designated as Local Green Space this is unlikely to apply to those spaces most valued by local communities.
10. Crime and Public Safety	0
	This policy would have no impact on crime and public safety

11. Housing	--
	This policy would restrict delivery of housing in the remaining areas of open space limiting the ability to meet the identified housing need for the local area.
12. Communities	0
	This policy would have no impact on communities
13. Education	0
	This policy would have no impact on education facilities
14. Economy	-
	This policy would restrict development including potential new employment floorspace on sites within Local Gaps
15. Town and Local Centres	0
	This policy would have no impact on town or local centres
16. Travel and Access	+
	This policy would enhance open spaces and help provide active transport routes between settlements.
Mitigation	None identified
Conclusions	<p>The exclusion of those sites designated as Local Green Space is the most significant modification proposed to this Policy as it limits the positive effects of this Policy.</p> <p>The policy scores as having very significant negative effects against the housing objective and to a lesser extent also the economy objective. This reflects how by protecting these areas most types of development will be restricted further reducing the land available to provide housing and reduce the shortfall in meeting local needs. This is balanced against very positive effects against the landscape and character objective and positive effects against the historic environment objective.</p>

Objective	SS6 Local Green Space
1. Environmental Quality	/
	This policy would protect valued green spaces however it is unlikely to address pollution.
2. Biodiversity	+
	This policy would protect valued green spaces conserving and protecting their habitats from inappropriate development. These positive effects could be maximised further by policy wording encouraging these sites to be managed for biodiversity.
3. Land and Soils	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
4. Energy	0
	This policy would have no impact on energy use
5. Water Management	+
	This policy provides protection to local green spaces some of which are valued for the role they provide in flood management.
6. Landscape and Character	+
	This policy protects valued green spaces which provide local communities with a sense of place.
7. Built Environment	0
	This policy would have no impact on the quality of the townscape or securing high quality design
	0

8. Historic Environment	This policy would have no impact on the historic environment
9. Healthy Lifestyles	+
	This policy protects local green spaces valued by local communities for the recreation and leisure opportunities they provide for relaxation and exercise.
10. Crime and Public Safety	0
	This policy would have no impact on crime and public safety
11. Housing	--
	This policy affords these sites a level of protection akin to green belt therefore restricting opportunities for housing delivery and limiting the ability to meet the identified housing need for the local area.
12. Communities	++
	This policy protects individual sites identified by the local community of being of particular importance to them for a wide range of reasons.
13. Education	0
	This policy would have no impact on education facilities
14. Economy	-
	This policy affords these sites a level of protection akin to green belt and would therefore restrict development including potential new employment floorspace on local green spaces.
15. Town and Local Centres	0
	This policy would have no impact on town or local centres
	+

16.Travel and Access	This policy would protect valued green spaces which provide green walking and cycling routes.
Mitigation	Positive effects against the biodiversity objective could be further maximised by the policy encouraging these sites to be managed for biodiversity.
Conclusions	<p>Despite the significant changes proposed by MM10, the scoring remains relatively unchanged with the only difference being the positive effect against the historic environment objective now having no effect. This is because the remaining Local Green Space (Brooklands) does not have any historic significance.</p> <p>The scoring reflects how by protecting these areas most types of development will be restricted further reducing the land available to provide housing and reduce the shortfall in meeting local needs. This is balanced against very positive effects against the communities objective and positive effects against a range of other objectives reflecting the range of reasons these sites are valued.</p>

Objective	A1 Beeches Avenue
1. Environmental Quality	<p>-</p> <p>The proximity of this site to the AQMA means development here without mitigation is likely to exacerbate congestion contributing to air pollution. Development should therefore be required to incorporate measures that deliver mitigation in line with the requirements of the Worthing Air Quality Action Plan.</p>
2. Biodiversity	<p>-</p> <p>Although development of greenfield sites is likely to result in a loss of biodiversity, the landscape and ecological study that supports the Local plan found this site had less than local value. Biodiversity should be enhanced to achieve net gains.</p>
3. Land and Soils	<p>-</p> <p>Allocation of this site would mean development of a largely undeveloped site.</p>
	-

4. Energy	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. This will be addressed through other policies in the Local Plan.
5. Water Management	<div>/</div> <p>The site is identified in the SFRA as at a low risk of flooding from all sources. However development could increase runoff rates therefore a SuDS scheme should be delivered as part of development.</p>
6. Landscape and Character	<div>-</div> <p>This site adjoins the current Built Up Area and the National Park. However the landscape study found it made a limited contribution to the setting of the National Park and gave the site an overall rating of medium/high suitability for development.</p>
7. Built Environment	<div>0</div> <p>This policy would have no impact on the quality of the townscape or securing high quality design</p>
8. Historic Environment	<div>0</div> <p>The site is not expected to affect any heritage assets or the historic environment.</p>
9. Healthy Lifestyles	<div>+</div> <p>The location of the site has the potential to improve walking links and access into the national park helping to improve people's physical health and connecting them with nature. This should be included as a development requirement to maximise this positive effect.</p>
10. Crime and Public Safety	<div>0</div> <p>This policy would have no impact on crime and public safety</p>
11. Housing	<div>++</div> <p>The allocation of this site for housing would have a very positive effect in helping to meet this objective.</p>
12. Communities	<div>?</div> <p>This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.</p>
	?

13. Education	This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
14. Economy	<p>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.</p>
15. Town and Local Centres	<p>0</p> <p>This allocation would have no impact on town or local centres</p>
16. Travel and Access	<p>+</p> <p>The allocation of this site has the potential to improve footpath links into the National Park. This should be included as a policy requirement to maximise this positive effect.</p>
Mitigation	<p>To minimise negative effects on environmental quality measures should be incorporated that deliver mitigation in line with requirements of the Worthing Air Quality Action Plan.</p> <p>To minimise negative effects on biodiversity as a result of loss, biodiversity should be enhanced to achieve net gains.</p> <p>To ensure no negative effects against the water management objective a SuDs scheme should be delivered as part of development.</p> <p>To maximise positive effects on healthy lifestyles and Travel objectives walking links and access into the National Park should be improved.</p>
Conclusions	<p>Mitigation has been identified to maximise positive and minimise negative effects. The policy scores negatively against a number of objectives which are predominantly environmental. This is balanced against very significant positive effects against the housing objective and further positive effects against the health and travel objectives.</p> <p>Proposed modification MM16 results in a number of development requirements being strengthened and more detailed, criterion g) has been deleted and one new development requirements being added. The proposed deletion of criterion g) has been assessed for the purpose of the SA. The removal of the development requirement to give consideration to the suitable relocation of the car repairers does not change the existing SA scoring criteria. Therefore it remains no effect for the economy objective. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary for consistency and to improve the effectiveness of the policy. The modifications do not change the general thrust of A1. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	A2 Caravan Club, Titnore Way
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>-</p> <p>Development of greenfield sites is likely to result in a loss of biodiversity. The landscape and ecology study that supports the Local Plan found the site was dominated by species poor and amenity grassland. However habitats bordering the northern and western boundaries form part of the Titnore and Goring Woods Local Wildlife Site. Biodiversity should be enhanced to achieve net gains.</p>
3. Land and Soils	<p>-</p> <p>Development of part of the caravan club would have a negative impact on this objective as the existing site is largely undeveloped.</p>
4. Energy	<p>-</p> <p>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. This will be addressed through other policies in the Local Plan.</p>
	-

5. Water Management	The SFRA identifies the eastern section of the site as being at a high risk of groundwater flooding. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.
6. Landscape and Character	<div>/</div> <p>Development of this largely undeveloped site will likely have an negative impact on this objective. However the landscape and ecology study that supports the Local Plan found the site formed a logical inclusion within the settlement pattern and concluded it had a medium/high suitability for development. To minimise any negative effects development requirements should include the importance to retain and enhance boundary vegetation to limit views of the site from the National Park.</p>
7. Built Environment	<div>0</div> <p>This policy would have no impact on the quality of the townscape or securing high quality design</p>
8. Historic Environment	<div>0</div> <p>The site is not expected to affect any heritage assets or the historic environment.</p>
9. Healthy Lifestyles	<div>0</div> <p>It is not expected the allocation of this site would have any direct impact on healthy lifestyles. However it is recognised that access to good quality housing will help support people's health and wellbeing.</p>
10. Crime and Public Safety	<div>0</div> <p>This policy would have no impact on crime and public safety</p>
11. Housing	<div>++</div> <p>The allocation of this site for housing would have a very positive effect in helping to meet this objective.</p>
	?

12. Communities	This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.
13. Education	?
	This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
14. Economy	/ -
	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 of the northern part of the site as a Caravan Club which will continue to support local tourism. Proposed MM17 results in development requirement g) being deleted. Therefore it is considered that this changes the scoring from neutral to negative due to the loss of visitor accommodation.
15.Town and Local Centres	0
	This allocation would have no impact on town or local centres
16.Travel and Access	/
	It is not expected that this allocation would have any significant positive or negative impact on improving access to sustainable modes of transport
Mitigation	<p>To minimise negative effects on biodiversity as a result of loss, biodiversity should be enhanced to achieve net gains.</p> <p>To ensure no negative effects against the water management objective a SuDs scheme should be delivered as part of development.</p> <p>To minimise negative effects on landscape & character boundary vegetation should be enhanced to limit views of the site from the National Park.</p>

Conclusions	<p>Mitigation has been identified to minimise negative effects. The policy scores negatively against a number of environmental objectives. This is balanced against very significant positive effects against the housing objective and neutral effects against the landscape, economy and travel objectives.</p> <p>Proposed modification MM17 results in a number of development requirements being strengthened and more detailed, criterion g) has been deleted with one new development requirement being added. With regard to the proposed deletion of development requirement g), it is considered that this changes the scoring for the economy objective from neutral to negative due to the loss of visitor accommodation for the local tourist economy. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary for consistency, to improve the effectiveness of the policy and in response to SDWLP-59 (Environment Agency) and MIQ-96. Whilst the scoring has been amended for the economy objective, it is considered that overall, the modifications do not change the general thrust of A2.</p>
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Objective	A3 Centenary House
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>0</p> <p>The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan</p>
3. Land and Soils	<p>++</p> <p>The redevelopment of this brownfield site will make efficient use of land and will reuse previously developed land. This will have a very positive impact on this objective.</p>
	-

4. Energy	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. This will be addressed through other policies in the Local Plan.
5. Water Management	-- The SFRA identifies the site as being at a high risk of groundwater flooding. There would also be a significant increase in surface water flood risk in the future due to climate change particularly in the south of the site. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.
6. Landscape and Character	0 The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.
7. Built Environment	0 This policy would have no impact on the quality of the townscape or securing high quality design
8. Historic Environment	0 The site is not expected to affect any heritage assets or the historic environment.
9. Healthy Lifestyles	0 It is not expected the allocation of this site would have any direct impact on healthy lifestyles.
10. Crime and Public Safety	++ The allocation and redevelopment of this site will provide enhanced facilities for Sussex Police which will help reduce crime.
11. Housing	+ The allocation of this site for mixed-uses including housing will have a positive effect in helping to meet this objective. This site could provide additional housing helping to further meet identified need if it was allocated for just housing.
	++

12. Communities	Redevelopment of this site provides an opportunity to deliver a multi-agency hub offering integrated and co-located public services which will benefit local communities
13. Education	?
	This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
14. Economy	++
	The delivery of new office space will have a very positive impact on this objective.
15. Town and Local Centres	0
	This allocation would have no impact on town or local centres
16. Travel and Access	/
	It is not expected that this allocation would have any significant positive or negative impact on improving access to sustainable modes of transport
Mitigation	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme to address the high risks posed by groundwater flood risk and in the future, as a result of climate change, surface water flooding.
Conclusions	The policy scores as having very significant negative effects against the water management objective, mitigation has been identified. This is balanced against very significant positive effects against the soils, crime, communities and economy objectives reflecting the benefits of a brownfield site bringing forward office floorspace and the benefits these enhanced facilities would bring to Sussex Police and other public services who occupy the site. Proposed modification MM19 results in a number of development requirements being strengthened and more detailed with five new development requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary for consistency, to improve the effectiveness of the policy and in response to the Inspector's Initial Question 17 (Ref-IL01), MIQ-98 and MIQ-99. The modifications do not change the general thrust of A3. On this basis, it is considered that there is no change to the SA assessment for this policy.

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Objective	A4 Civic Centre, Stoke Abbott Road
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>0</p> <p>The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan</p>
3. Land and Soils	<p>++</p> <p>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.</p>
4. Energy	<p>-</p> <p>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. This will be addressed through other policies in the Local Plan.</p>
5. Water Management	<p>-</p> <p>The SFRA identifies the site as being at a medium risk of groundwater flooding. This is a brownfield site. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>
6. Landscape and Character	<p>0</p> <p>The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.</p>
7. Built Environment	<p>+</p> <p>Redevelopment of this town centre site car park will help improve the quality of the townscape.</p>

8. Historic Environment	-
	The site is located adjacent to several listed buildings. To mitigate any potential negative effects the policy wording should require that development is sensitive to the surrounding Conservation Areas and considers the importance of protecting neighbouring listed buildings and other heritage assets.
9. Healthy Lifestyles	++
	The allocation of this site for new integrated health hub will help support the health and wellbeing of local residents.
10. Crime and Public Safety	0
	This policy would have no impact on crime and public safety
11. Housing	/
	The allocation of this site for an integrated health hub will not help deliver housing to meet identified need. This allocation would score more positively if the allocation was amended to housing.
12. Communities	++
	The provision of a new health hub will have a very positive impact on this objective.
13. Education	0
	This policy would have no direct impact on education
14. Economy	?
	The delivery of a health hub will be formed through the relocation of existing services. It is unclear whether this will provide new jobs.
15. Town and Local Centres	0
	This allocation would have no impact on town or local centres
16. Travel and Access	+
	The allocation of this site has the potential to enhance and create attractive pedestrian routes to the town centre. This should be included as a policy requirement to maximise this positive effect.

Mitigation	<p>To minimise negative effects against the water management objective a SuDs scheme should be delivered as part of development.</p> <p>To minimise negative effects against the historic environment objective heritage assets and their settings should be protected.</p> <p>To maximise positive effects on travel and access development should create and enhance pedestrian routes to the town centre.</p>
Conclusions	<p>This policy scores as having very significant positive effects against soils, health and community objectives reflecting the benefits of the proposed use of this brownfield site as an integrated health hub. It also scores positively against built environment and travel objectives. This is balanced against negative scores for energy, water and historic environment objectives. Mitigation has been identified to minimise the negative effects against the water and historic environment objectives.</p> <p>Proposed modification MM20 results in a number of development requirements being strengthened and more detailed with three new development requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary for consistency, to improve the effectiveness of the policy and in response to the Inspector's Initial Question 17 (Ref-IL01). The modifications do not change the general thrust of A4. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	A5 Decoy Farm
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated here and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p> <p>In addition the site is adjacent to the Teville Stream. Policy wording should ensure this is protected from contamination as a result of construction on the landfill site.</p>
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2. Biodiversity	<p>This site is on a former landfill and consists of grassland with the Teville Stream running along the site boundary. Development therefore has the potential to result in a loss of biodiversity. The policy should refer to development requirements to protect and enhance valued habitats to achieve a net gain in biodiversity.</p>
3. Land and Soils	<p style="text-align: center;">+</p> <p>Although the site is largely undeveloped it is a former landfill. Therefore, development will support the remediation of contaminated soils. This will have a positive impact on this objective.</p>
4. Energy	<p style="text-align: center;">-</p> <p>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. This will be addressed through other policies in the Local Plan.</p>
5. Water Management	<p style="text-align: center;">-</p> <p>Parts of the site along the site boundaries are shown in the SFRA as in Flood Zone 3. However this does not take into account the recent realignment of the Teville Stream. Small parts of the site are also shown as at a high risk of surface and groundwater flood risk. The SFRA recommends that the most vulnerable development types are located in the lowest risk parts of the site and that a SuDS scheme should be developed.</p>
6. Landscape and Character	<p style="text-align: center;">-</p> <p>This undeveloped site is located within the current Built Up Area but also adjoins the Worthing/Sompting Gap. Development will need to have regard to and protect and enhance the distinctive character of the Local Green Gap.</p>
7. Built Environment	<p style="text-align: center;">0</p> <p>This policy would have no impact on the quality of the townscape or securing high quality design</p>
8. Historic Environment	<p style="text-align: center;">0</p> <p>The site is not expected to affect any heritage assets or the historic environment.</p>

9. Healthy Lifestyles	0
	It is not expected the allocation of this site would have any direct impact on healthy lifestyles.
10. Crime and Public Safety	0
	This policy would have no impact on crime and public safety
11. Housing	0
	This site is not suitable for housing due to levels of contaminated land so the policy will have no impact on this objective.
12. Communities	0
	This policy would have no direct impact on communities
13. Education	0
	This policy would have no direct impact on education
14. Economy	++
	The delivery of new industrial / warehousing floorspace will have a very positive impact on this objective.
15. Town and Local Centres	0
	This allocation would have no impact on town or local centres
16. Travel and Access	+
	The allocation of this site has the potential to help facilitate pedestrian links to proposed routes across the Local Green Gap. This should be included as a policy requirement to maximise this positive effect.

Mitigation	<p>To reduce potential negative effects against environmental quality objective the policy should ensure the Teville Stream is protected from contamination as a result of construction or land remediation.</p> <p>To minimise negative effects on biodiversity valued habitats should be protected and enhanced to achieve a net gain in biodiversity.</p> <p>To ensure no negative effects against the water management objective the most vulnerable uses should be located in the parts of the site with lowest flood risk and a SuDs scheme should be delivered.</p> <p>To minimise negative effects on landscape & character development should protect and enhance the character of the Local Green Gap</p> <p>To maximise positive effects on travel links should be facilitated to proposed pedestrian routes in the Gap.</p>
Conclusions	<p>The policy scores as having very significant positive effects against the economy objective as a result of the new employment floorspace that will be delivered through this site. It also scores positively against the soils and travel objectives. This is balanced against potential negative effects identified against environmental objectives. Mitigation has been identified to minimise these.</p> <p>Proposed modification MM21 results in the indicative capacity being adjusted from 18,000 sqm to 14,000 sqm employment land. A number of development requirements have been strengthened and more detailed. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to clarify policy position, to improve the effectiveness of the policy and in response to SDWLP-42 (Lichfields on behalf of GlaxoSmithKline Plc), SDWLP-55 (WSP on behalf of Worthing Borough Council), SDWLP-59 (Environment Agency) and SDWLP-61 (WSCC). The modifications do not change the general thrust of A5. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	A6 Fulbeck Avenue
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
	-

2. Biodiversity	Development of greenfield sites is likely to result in a loss of biodiversity. The landscape and ecology study that supports the Local Plan found 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. Biodiversity should be enhanced to achieve net gains.
3. Land and Soils	-
	Development of this site would have a negative impact on this objective as the existing site is undeveloped.
4. Energy	-
	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. This will be addressed through other policies in the Local Plan.
5. Water Management	- -
	The SFRA shows a small section of the site in the north and centre is located within Flood Zone 3b. A further northern section of the site is also located within Flood Zone 3a. In addition 1/4 of the site is at a high risk of surface water flooding and approximately 1/3 of the site is at high risk of groundwater flooding. The SFRA also found that Somerset Lake posed a risk to the site in event of breach resulting in 38% of the site being affected on a dry day with depths up to 1.4m and on a wet day over half the site affected with depths up to 1.6m. Therefore development in this location would place additional people at risk of flooding. The SFRA recommends that any FRA considers other sources of flooding, the most vulnerable development types are located in the lowest risk parts of the site and that mitigation will be required to ensure development is made safe and to reduce the overall level of flood risk at the site.
	-

6. Landscape and Character	Development of this undeveloped site will have a negative impact on this objective. However the landscape and ecology study that supports the Local Plan found the southern half of the site formed a logical inclusion within the settlement pattern. The study concludes that the southern half has a high suitability for development and the northern half a medium suitability for development. Mitigation should be included within the development requirements to ensure the northern area of woodland is retained and enhanced to limit views of the site from the National Park.
7. Built Environment	0
	This policy would have no impact on the quality of the townscape or securing high quality design
8. Historic Environment	0
	The site is not expected to affect any heritage assets or the historic environment.
9. Healthy Lifestyles	0
	It is not expected the allocation of this site would have any direct impact on healthy lifestyles. However it is recognised that access to good quality housing will help support people's health and wellbeing.
10. Crime and Public Safety	0
	This policy would have no impact on crime and public safety
11. Housing	++
	The allocation of this site for housing would have a very positive effect in helping to meet this objective.
12. Communities	?
	This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.
13. Education	?
	This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
	0

14. Economy	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.
15. Town and Local Centres	0 This allocation would have no impact on town or local centres
16. Travel and Access	/ It is not expected that this allocation would have any significant positive or negative impact on improving access to sustainable modes of transport
Mitigation	<p>To minimise negative effects on biodiversity valued habitats should be protected and enhanced to achieve a net gain in biodiversity.</p> <p>To ensure no negative effects against the water management objective the most vulnerable uses should be located in the parts of the site with lowest flood risk, a FRA should consider all sources of flooding and mitigation provided to ensure development is safe and to reduce flood risk overall.</p> <p>To minimise negative effects on landscape & character woodland should be retained and enhanced to minimise the impact on views from the National Park.</p>
Conclusions	<p>This policy scores as having very significant positive effects against the housing objective reflecting the contribution towards meeting local need. However this against scoring of very significant negative effects for the water objective reflecting the level of risk identified. Development should provide mitigation identified through a FRA to ensure it is safe and to reduce overall flood risk. The allocation also scores negatively against other environmental objectives including biodiversity, soils, energy and landscape. Additional mitigation has been identified to minimise these effects.</p> <p>Proposed modification MM22 results in the indicative capacity being adjusted from 120 units to 152 units. A number of development requirements have been strengthened and more detailed with requirements b), d), e) and i) being deleted. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to clarify policy position, to improve the effectiveness of the policy and in response to SDWLP-59 (Environment Agency) and MIQ-110. The modifications do not change the general thrust of A6. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	A7 Grafton
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>0</p> <p>The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan</p>
3. Land and Soils	<p>++</p> <p>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.</p>
4. Energy	<p>-</p> <p>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. This will be addressed through other policies in the Local Plan.</p>
5. Water Management	<p>--</p> <p>Parts of the site lie within Flood Zone 3 the site is therefore at a high risk of coastal flooding and the SFRA states that climate change will have a significant impact on this site with Flood Zone 3 covering the whole site in the future. Therefore development in this location would place additional people at risk of flooding. The SFRA recommends that mitigation will be required to ensure development is made safe and to reduce the overall level of flood risk at the site.</p>
6. Landscape and Character	<p>0</p> <p>The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.</p>
7. Built Environment	<p>+</p> <p>Redevelopment of this town centre site car park will help improve the quality of the townscape and help improve the relationship between the town centre and the seafront.</p>
	-

8. Historic Environment	The site is surrounded by several Conservation Areas and is opposite the Lido (a Grade II Listed Building). To mitigate any potential negative effects the policy wording should require development to provide an attractive setting to the historic environment, improving its current setting.
9. Healthy Lifestyles	0
	It is not expected the allocation of this site would have any direct impact on healthy lifestyles. However it is recognised that access to good quality housing will help support people's health and wellbeing.
10. Crime and Public Safety	+
	Regeneration of a town centre site could help improve links between the town centre and seafront. Increasing the number of people living here may help to improve the vibrancy of this section of the high street and help improve natural surveillance reducing crime and the fear of crime.
11. Housing	+
	The allocation of this site for mixed-uses (including a significant level of housing) housing would have a positive effect in helping to meet this objective. This site could provide additional housing helping to further meet identified need if it was allocated for just housing.
12. Communities	?
	This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.
13. Education	?
	This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
14. Economy	+
	The delivery of new commercial floorspace as part of a mixed use scheme will help support economic growth.
15. Town and Local Centres	++
	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.
	+

16.Travel and Access	The allocation of this site has the potential to provide a new route linking the seafront with the primary shopping area. This should be included as a policy requirement to maximise this positive effect.
Mitigation	<p>To minimise negative effects against the water management objective mitigation should be provided to ensure development is safe and reduce the overall level of flood risk.</p> <p>To minimise negative effects against the historic environment, development should seek to improve the current setting of heritage assets.</p> <p>To maximise positive effects on travel and access development should create and enhance pedestrian routes between the seafront and primary shopping area.</p>
Conclusions	<p>This policy scores as having very significant positive effects against the soils and town centre objectives reflecting the benefits of regenerating a key town centre site. It also scores positively against the built environment, crime, housing, economy and travel objectives. However this is balanced against a very significant negative effect against the water management objective reflecting that the development is within Flood Zone 3 and further negative effects reflecting the potential impact on nearby heritage assets and the energy objective. Mitigation has been identified and it is recognised that in relation to the heritage objective that mitigation has the potential to improve the current setting resulting in an overall positive effect.</p> <p>Proposed modification MM23 results in a number of development requirements being strengthened and more detailed and two additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions and in response to SDWLP-59 (Environment Agency) . The modifications are considered necessary to improve the effectiveness of the policy. The modifications do not change the general thrust of A7. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	A8 HMRC Offices, Barrington Road
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>

2. Biodiversity	0
	The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan
3. Land and Soils	++
	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.
4. Energy	-
	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. This will be addressed through other policies in the Local Plan.
5. Water Management	-
	The SFRA identifies the site as being at a medium risk of groundwater flooding and a small part of the site (3%) is also at a medium risk of surface water flooding. This is a brownfield site. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.
6. Landscape and Character	0
	The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.
7. Built Environment	0
	This policy would have no impact on the quality of the townscape or securing high quality design
8. Historic Environment	0
	The site is not expected to affect any heritage assets or the historic environment.
	0

9. Healthy Lifestyles	It is not expected the allocation of this site would have any direct impact on healthy lifestyles. However it is recognised that access to good quality housing will help support people's health and wellbeing.
10. Crime and Public Safety	0 This policy would have no impact on crime and public safety
11. Housing	++ The allocation of this site for housing and a care home / sheltered accommodation would have a very positive effect in helping to meet this objective.
12. Communities	? This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.
13. Education	? This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
14. Economy	- The allocation of this site for housing will result in a loss of employment floorspace. This is partly due to a relocation of HMRC elsewhere within Worthing and will be mitigated through allocation of the adjacent site.
15. Town and Local Centres	+ This allocation is located near to a local centre. Redevelopment could have a positive effect supporting the vitality of this centre
	+

16.Travel and Access	The allocation of this site has the potential to improve access to and from Durrington Station. This should be included as a policy requirement to maximise this positive effect.
Mitigation	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme and to maximise positive effects on travel by improving access to and from Durrington Station.
Conclusions	<p>This allocation scores as having very significant positive effects against soils and housing objectives and further positive effects against town and local centres and travel objectives reflecting the sustainable location of this brownfield site. This is balanced against negative effects identified against the energy, water and economy objectives. Proposed modification MM24 results in a number of development requirements being strengthened and more detailed and three additional requirements being added.</p> <p>The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy. The modifications do not change the general thrust of A8. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	A9 Lyndhurst Road
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>0</p> <p>The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan</p>
	++

3. Land and Soils	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.
4. Energy	- 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. This will be addressed through other policies in the Local Plan.
5. Water Management	- The SFRA identifies the site as being at a medium risk of groundwater flooding. This is a brownfield site. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.
6. Landscape and Character	0 The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.
7. Built Environment	++ Redevelopment of this vacant site will have a positive impact on this objective.
8. Historic Environment	0 The site is not expected to affect any heritage assets or the historic environment.
9. Healthy Lifestyles	0 It is not expected the allocation of this site would have any direct impact on healthy lifestyles. However it is recognised that access to good quality housing will help support people's health and wellbeing.
10. Crime and Public Safety	0 Regeneration of a key site near the town centre and hospital will help improve pedestrian routes and natural surveillance reducing crime and the fear of crime.
	++

11. Housing	The allocation of this site for housing would have a very positive effect in helping to meet this objective.
12. Communities	?
	This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.
13. Education	?
	This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
14. Economy	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.
15. Town and Local Centres	+
	This allocation is located near to the town centre. Redevelopment could have a positive effect supporting the vitality of this centre and improving pedestrian links from a wider area.
16. Travel and Access	+
	The allocation of this site has the potential to provide attractive and accessible pedestrian / cycle routes to the High Street and town centre along the sites northern boundary. This should be included as a policy requirement to maximise this positive effect.
Mitigation	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme and to maximise positive effects on travel by providing attractive and accessible pedestrian and cycle routes from the site to the High Street and town centre.

Conclusions	<p>This allocation scores as having very significant positive effects against soils, built environment and housing objectives and further positive effects against town centre and travel objectives reflecting the sustainable location of this vacant brownfield site. This is balanced against negative effects identified against the energy and water objectives.</p> <p>Proposed modification MM25 results in a number of development requirements being strengthened and more detailed with requirement c) being deleted and four additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and to reflect progress made on the site. The modifications do not change the general thrust of A9. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>
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Objective	A10 Martlets Way
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>0</p> <p>The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan</p>
3. Land and Soils	<p>++</p> <p>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.</p>
4. Energy	<p>-</p> <p>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. This will be addressed through other policies in the Local Plan.</p>
	-

5. Water Management	The SFRA identifies the site as being at a medium risk of groundwater flooding and a small part of the site (2%) is also at a medium risk of surface water flooding. This is a brownfield site. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.
6. Landscape and Character	0 The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.
7. Built Environment	++ Redevelopment of this vacant site will have a positive impact on this objective.
8. Historic Environment	0 The site is not expected to affect any heritage assets or the historic environment.
9. Healthy Lifestyles	0 It is not expected the allocation of this site would have any direct impact on healthy lifestyles.
10. Crime and Public Safety	0 This policy would have no impact on crime and public safety
11. Housing	+ Proposed modification MM26 introduces an element of residential onto this site and as such the site will now provide for new industrial /warehousing uses together with at least 28 residential units. It is therefore considered that in assessing the revised policy against this objective results in a change of scoring of this objective from a neutral effect to a positive effect.
12. Communities	? Proposed modification MM26 now includes an element of residential on this site. As such whilst this policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.
	?

13. Education	Proposed modification MM26 now includes an element of residential on this site. As such whilst this policy would have no direct impact on education but additional housing could, without mitigation, increase demand for school places.
14. Economy	++ The delivery of new industrial / warehousing floorspace will have a very positive impact on this objective.
15. Town and Local Centres	+ This allocation is located near to a local centre. Redevelopment could have a positive effect supporting the vitality of this centre
16. Travel and Access	/ It is not expected that this allocation would have any significant positive or negative impact on improving access to sustainable modes of transport
Mitigation	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme.
Conclusions	<p>This allocation scores as having very significant positive effects against soils, built environment and economy objectives and further positive effects against the town and local centres objective reflecting the sustainable location of this vacant brownfield site. This is balanced against negative effects identified against the energy and water objectives.</p> <p>Proposed modification MM26 results in a number of development requirements being strengthened and more detailed with three new additional requirements being added. Development requirement a) has been amended to introduce a new residential element comprising 28 units. It is considered that this results in a change of scoring to objective 11 (Housing) from a neutral effect to a positive effect given that an element of housing has now been introduced. In addition, the scoring for objective 12 (communities) and objective 13 (education) have been amended from having no direct impact on these two objectives to having an 'uncertain' effect as the addition of housing on this site could, without mitigation, increase demand for existing community services. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy.</p>

Objective	A11 Stagecoach, Marine Parade
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>0</p> <p>The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan</p>
3. Land and Soils	<p>++</p> <p>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.</p>
4. Energy	<p>-</p> <p>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. This will be addressed through other policies in the Local Plan.</p>
5. Water Management	<p>--</p> <p>Parts of the site lie within Flood Zone 3 the site is therefore at a high risk of coastal flooding and the SFRA states that climate change will have a significant impact on this site with Flood Zone 3 covering the whole site in the future. Therefore development in this location would place additional people at risk of flooding. The SFRA recommends that mitigation will be required to ensure development is made safe and to reduce the overall level of flood risk at the site.</p>
6. Landscape and Character	<p>0</p> <p>The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.</p>
	+

7. Built Environment	Redevelopment of this town centre bus depot will help improve the quality of the townscape and help improve the relationship between the town centre and the seafront.
8. Historic Environment	<p>-</p> <p>The whole site is bounded by Conservation Areas with a small part of the site within the Steyne Gardens Conservation Area. It is also adjacent to the Dome Cinema a Grade II* Listed Building and several other listed buildings in close proximity. To mitigate any potential negative effects the policy wording should ensure development is sensitive to the surrounding heritage assets and help to enhance their setting.</p>
9. Healthy Lifestyles	<p>0</p> <p>It is not expected the allocation of this site would have any direct impact on healthy lifestyles. However it is recognised that access to good quality housing will help support people's health and wellbeing.</p>
10. Crime and Public Safety	<p>0</p> <p>Regeneration of a town centre site could help improve links between the town centre and seafront. Increasing the number of people living here may help to improve the vibrancy of this part of the town centre and help improve natural surveillance reducing crime and the fear of crime.</p>
11. Housing	<p>+</p> <p>The allocation of this site for mixed-uses (including a significant level of housing) housing would have a positive effect in helping to meet this objective. This site could provide additional housing helping to further meet identified needs if it was allocated for just housing.</p>
12. Communities	<p>?</p> <p>This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.</p>
13. Education	<p>?</p> <p>This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.</p>

14. Economy	<div data-bbox="518 194 1390 248">+</div> <div data-bbox="518 248 1390 405">The delivery of new commercial floorspace as part of a mixed use scheme will help support economic growth.</div>
15.Town and Local Centres	<div data-bbox="518 405 1390 459">++</div> <div data-bbox="518 459 1390 667">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.</div>
16.Travel and Access	<div data-bbox="518 667 1390 721">+</div> <div data-bbox="518 721 1390 974">The allocation of this site has the potential to provide attractive and accessible pedestrian links from the seafront to Warwick Street . This should be included as a policy requirement to maximise this positive effect.</div>
Mitigation	<div data-bbox="518 974 1390 1326"> <p>To minimise negative effects against the water management objective mitigation should be provided to ensure development is safe and reduce the overall level of flood risk.</p> <p>To minimise negative effects against the historic environment development should be sensitive to nearby assets and help to enhance their setting.</p> <p>To maximise positive effects on travel and access development should provide attractive and accessible pedestrian links between the seafront and Warwick Street.</p> </div>

Conclusions	<p>This allocation scores as having very significant positive effects against the soils and town centre objectives reflecting the benefits of regenerating this town centre site. It also scores positively against the built environment, housing, economy and travel objectives. However this is balanced against a very significant negative effect against the water management objective as development in this location will place more people at a high risk of flooding and further negative effects due to the potential impact on the historic environment and energy objectives. Mitigation has been identified and it is recognised that in relation to the heritage objective that mitigation has the potential to improve the current setting resulting in an overall positive effect.</p> <p>Proposed modification MM27 results in a number of development requirements being strengthened and more detailed with requirement d) being deleted and one new additional requirement being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and in response to SDWLP-59 (Environment Agency) and Inspector's Initial Question 17 (Ref-IL01). The modifications do not change the general thrust of A11. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>
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Objective	A12 Teville Gate
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>0</p> <p>The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan</p>
	++

3. Land and Soils	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.
4. Energy	- 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. This will be addressed through other policies in the Local Plan.
5. Water Management	- The SFRA shows 1/3 of the site is at a high risk of surface water flooding. This is a brownfield site. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.
6. Landscape and Character	0 The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.
7. Built Environment	++ Redevelopment of this vacant site 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.
8. Historic Environment	- The site is located in close proximity to the Worthing Railway Station and the Grand Victorian Hotel (Grade II Listed). To mitigate any potential negative effects the policy wording should ensure development protects and enhances nearby heritage assets and that no significant harm is caused to them or their settings.
	0

9. Healthy Lifestyles	It is not expected the allocation of this site would have any direct impact on healthy lifestyles. However it is recognised that access to good quality housing will help support people's health and wellbeing.
10. Crime and Public Safety	<div>+</div> <p>Regeneration of a key site adjacent to the train station will help improve the public realm, pedestrian routes and improve natural surveillance reducing crime and the fear of crime.</p>
11. Housing	<div>+</div> <p>The allocation of this site for mixed-uses (including a significant level of housing) housing would have a positive effect in helping to meet this objective. This site could provide additional housing helping to further meet identified need if it was allocated for just housing.</p>
12. Communities	<div>?</div> <p>This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.</p>
13. Education	<div>?</div> <p>This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.</p>
14. Economy	<div>+</div> <p>The delivery of new commercial floorspace as part of a mixed use scheme will help support economic growth.</p>
	+

15.Town and Local Centres	This policy would have a positive effect as improved connectivity between the station and town centre will help to meet this objective
16.Travel and Access	<div style="text-align: center; background-color: #d4edda;">+</div> <p>The allocation of this site has the potential to provide cycle and pedestrian links from the station to the town centre and under the A24 to Morrisons. This should be included as a policy requirement to maximise this positive effect.</p>
Mitigation	<p>To minimise negative effects against the water management a SuDS scheme should be developed to reduce overall risk.</p> <p>To minimise negative effects against the historic environment development should seek to protect and enhance heritage assets and their settings to ensure no significant harm is caused.</p> <p>To maximise positive effects on travel and access development should provide pedestrian and cycle routes from the station to the town centre and Morrisons.</p>
Conclusions	<p>This allocation scores as having very significant positive effects against the soils and built environment objectives reflecting the benefits associated with regenerating this vacant brownfield site. Further positive effects have been identified against the crime, housing, economy, town centre and travel objectives and mitigation identified to maximise these further. This is balanced against negative effects associated with the energy, water and historic environment objectives. Mitigation has been identified and it is recognised that in relation to the heritage objective that mitigation has the potential to improve the current setting resulting in an overall positive effect.</p> <p>Proposed modification MM28 results in a number of development requirements being strengthened and more detailed with four additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and in response to SDWLP-59 (Environment Agency). The modifications do not change the general thrust of A12. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

A13 Titnore Lane

The Proposed Modification MM29 seeks to delete the proposed allocation of this site to accord with the Inspectors Post Hearing Advice Letter (IL07) which concluded that the risk of adverse impacts from developing the site would significantly and demonstrably outweigh the benefits. The allocation is not justified or consistent with national policy.

Objective	A14 Union Place
1. Environmental Quality	<p>?</p> <p>Any new development without mitigation has the potential to increase car use contributing to air quality issues. However given the type of development allocated and the distance of this site from the AQMA the direct impact of allocating this site on air quality is difficult to determine.</p>
2. Biodiversity	<p>0</p> <p>The allocation of this brownfield site will have no direct impact on this objective. The need to protect and enhance biodiversity to achieve a net gain is covered through other policies in the Local Plan</p>
3. Land and Soils	<p>++</p> <p>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.</p>
4. Energy	<p>-</p> <p>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. This will be addressed through other policies in the Local Plan.</p>
5. Water Management	<p>-</p> <p>The site is identified in the SFRA as at a low risk of flooding from coastal / fluvial flooding, with a small portion of the site (5%) at a medium risk of surface water flooding and 42% of the site at a medium risk of groundwater flooding. This is a brownfield site. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>
	0

6. Landscape and Character	The allocation of this brownfield site within the existing Built Up Area would have no impact on landscape and character.
7. Built Environment	++ Redevelopment of this vacant town centre site 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.
8. Historic Environment	- The site is located to the east of Chapel Road Conservation Area and there are a number of Grade II Listed Buildings nearby along with an Archaeological Notification Area. To mitigate any potential negative effects the policy wording should ensure development protects and enhances nearby heritage assets.
9. Healthy Lifestyles	0 It is not expected the allocation of this site would have any direct impact on healthy lifestyles. However it is recognised that access to good quality housing will help support people's health and wellbeing.
10. Crime and Public Safety	+ Regeneration of a vacant town centre site would help improve the vitality of the town centre, and increasing the number of people living in the town centre will help improve natural surveillance helping to reduce crime and the fear of crime.
11. Housing	+ The allocation of this site for mixed-uses (including a significant level of housing) housing would have a positive effect in helping to meet this objective. This site could provide additional housing helping to further meet identified need if it was allocated for just housing.
12. Communities	? This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.

13. Education	?
	This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
14. Economy	+
	The delivery of new commercial floorspace as part of a mixed use scheme will help support economic growth.
15. Town and Local Centres	++
	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.
16. Travel and Access	/
	It is not expected that this allocation would have any significant positive or negative impact on improving access to sustainable modes of transport
Mitigation	<p>To minimise negative effects against the water management objective a SuDS scheme should be developed to reduce overall risk.</p> <p>To minimise negative effects against the historic environment objective development should ensure it protects and enhances nearby heritage assets.</p>
Conclusions	<p>This allocation scores as having very significant positive effects against the soils, built environment and town centre objectives. There are also further positive effects associated with the crime, housing and economy objectives reflecting the benefits of regenerating this vacant town centre site. This is balanced against negative effects associated with the energy, water and historic environment objectives. Mitigation has been identified.</p> <p>Proposed modification MM30 results in a number of development requirements being strengthened and more detailed with two additional requirements being added. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and in response to the Inspector's Initial Question 17 (Ref-IL01). The modifications do not change the general thrust of A14. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	A15 Upper Brighton Road
1. Environmental Quality	-
	The proximity of this site to the AQMA means development here without mitigation is likely to exacerbate congestion contributing to air pollution. Development should therefore be required to incorporate measures that deliver mitigation in line with the requirements of the Worthing Air Quality Action Plan.
2. Biodiversity	-
	Development of greenfield sites is likely to result in a loss of biodiversity. The landscape and ecology study that supports the Local Plan found the habitats/features of highest ecological interest were the hedgerows and scrub along field boundaries and the potential waterbody to the east of the site which form part of a wider wildlife corridor. These features should be enhanced to achieve biodiversity net gains.
3. Land and Soils	- -
	Development of this site would have a negative impact on this objective as the existing site is undeveloped arable fields.
4. Energy	-
	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. This will be addressed through other policies in the Local Plan.
5. Water Management	-
	The SFRA identifies part of the site as being at a high risk of groundwater flooding. The SFRA recommends that a SuDS scheme should be developed for the site to provide mitigation and opportunities to achieve a reduction in overall flood risk.
6. Landscape and Character	-
	Development of this site would result in an extension of the current Built Up Area into the open space that forms the part of the physical separation between Worthing and Sompting. However the landscape and ecology study that supports the Local Plan found the site was detached from the Worthing-Sompting gap but did form part of the undeveloped setting of the National Park. It concluded that the site had a medium suitability for development. To minimise negative effects development requirements should seek to avoid coalescence and mitigate visual impacts from the National Park.
	0

7. Built Environment	This policy would have no impact on the quality of the townscape or securing high quality design
8. Historic Environment	- The site is located in close proximity to the Sompting Conservation Area and Upton Farm House (Grade II Listed Building). To mitigate any potential negative effects the policy wording should ensure development protects and enhances nearby heritage assets and that no significant harm is caused to them or their settings.
9. Healthy Lifestyles	+ The location of the site has the potential to improve walking links and access into the national park helping to improve people's physical health and connecting them with nature. This should be included as a development requirement to maximise this positive effect.
10. Crime and Public Safety	0 This policy would have no impact on crime and public safety
11. Housing	++ The allocation of this site for housing would have a very positive effect in helping to meet this objective.
12. Communities	? This policy would have no direct impact on communities but additional housing could, without mitigation, increase demand for existing community services.
13. Education	? This policy would have no direct impact on education but additional housing could without mitigation increase demand for school places.
14. Economy	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.
15. Town and Local Centres	0 This allocation would have no impact on town or local centres
16. Travel and Access	+ The allocation of this site has the potential to improve pedestrian and cycle routes along Upper Brighton Road. This should be included as a policy requirement to maximise this positive effect.

Mitigation	<p>To minimise negative effects on environmental quality development should be required to incorporate measures that deliver mitigation in line with the requirements of the Worthing Air Quality Action Plan.</p> <p>To minimise negative effects on biodiversity those features of highest ecological value on the site should be enhanced to achieve net gains.</p> <p>To minimise negative effects against the water management objective a SuDS scheme should be developed to reduce overall risk.</p> <p>To minimise negative effects on landscape and character development should avoid coalescence and mitigate visual impacts from the National Park.</p> <p>To minimise negative effects against the historic environment development should ensure it protects and enhance the setting of nearby heritage assets.</p> <p>To maximise positive effects on health development should improve walking links and access to the National Park.</p> <p>To maximise positive effects on travel development should improve pedestrian and cycle routes along Upper Brighton Road.</p>
Conclusions	<p>This allocation scores as having very significant positive effects against the housing objective and further positive effects against the health and travel objectives. However this is balanced against very significant negative effects against the soils objective reflecting the loss of arable fields and further negative effects against the environmental quality, biodiversity, energy, water, landscape and historic environment objectives due to the potential environmental impact of greenfield development. Mitigation has been identified to minimise negative and maximise positive effects.</p> <p>Proposed modification MM31 seeks amendments pertaining supporting text paragraph 4.43, development requirement n) being deleted along with a number of development requirements being strengthened and more detailed. The proposed amendments to the supporting text and development requirements have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy and in response to MIQ - 133. The modifications do not change the general thrust of A15. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	DM1 Housing Mix
1. Environmental Quality	0
	This policy will have no impact on this objective
	0

2. Biodiversity	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	?
	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 on some sites.
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	?
	The policy aims to resist loss of existing residential accommodation especially where suitable for family occupation; however, in some circumstances this may be necessary to preserve the special architectural or historic interest of a listed building.
9. Healthy Lifestyles	+
	This policy sets the expectation for all new build dwellings to meet Building Regulations Standard m4(2) for Accessible and Adaptable dwellings. This will help support health and wellbeing by enabling people to remain independent as long as possible in housing that is of a high quality and adaptable to their changing needs and requirements.
10. Crime and Public Safety	0
	This policy will have no impact on this objective
	++

11. Housing	This policy will ensure development provides a range of dwelling types, tenures and sizes are provided that reflect and respond to housing needs and demands.
12. Communities	+
	This policy will help ensure mixed and balanced communities are created through an appropriate housing mix based on evidence of housing needs and demands.
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	0
	This policy will have no impact on this objective
Mitigation	None identified
Conclusions	This policy as would be expected scores very positively on the housing objective. It has positive outcomes under the communities and healthy lifestyles objectives as the policy seeks to deliver a mix of dwellings to meet the community's needs. The proposed modifications set out in MM32 seek to ensure that the policy is justified , effective and consistent with national policy and none of the changes result in a change to the intention of the policy nor the assessment of it.

Objective	DM2 Density
1. Environmental Quality	0
	This policy will have no impact on this objective

2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	++
	This policy seeks to make the most efficient use of land through increasing densities
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective. Developing at a higher density does not prevent implementation of a SuDS scheme provided it is developed as an intrinsic part of the development. This is dealt with through other policies in the Plan.
6. Landscape and Character	?
	This policy seeks to increase densities where appropriate. To minimise any potential conflict with this objective the policy wording should refer to consideration that needs to be given to important landscapes when determining the appropriate density for a site.
7. Built Environment	+
	This policy sets out a design led approach to determining density.
8. Historic Environment	?
	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.
9. Healthy Lifestyles	+
	Adopting the minimum nationally described space standards and the Council's local standards for external space will help support healthy lifestyles
10. Crime and Public Safety	0
	This policy will have no impact on this objective

11. Housing	++
	This policy will help ensure the most efficient use of land is made maximising the delivery of housing.
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	+
	This policy recognises that higher densities should be achieved in the town centre and close to local services which help support their vitality and vibrancy
16. Travel and Access	+
	This policy recommends a higher minimum density near public transport hubs
Mitigation	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.
Conclusions	This policy scores very positively against the objectives for land and soils, town and local centres, travel and access and as expected against the objective for housing. It also scores positively against the built environment and healthy lifestyles objectives. Proposed modification MM29 proposes changes to ensure that the policy is effective. The proposed changes do not change the intention of the policy and as such there is no change in the assessment.

Objective	DM3 Affordable Housing

1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	+
	<p>This provision of affordable housing will help ensure those on the housing register are provided suitable accommodation.</p> <p>Proposed modification MM35 specifies the mix of affordable housing tenure types required on a qualifying site. It also introduces a % threshold for Wheelchair Accessible Standards (M4(3)). This will help support health and wellbeing by enabling people to remain independent as long as possible in housing that is of a high quality to meet their needs and requirements.</p>
10. Crime and Public Safety	0
	This policy will have no impact on this objective

11. Housing	++
	This policy will ensure that on sites of a sufficient size a proportion of affordable housing is provided to help meet local needs.
12. Communities	0
	This policy will have no impact on this objective.
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	0
	This policy will have no impact on this objective
Mitigation	None identified
Conclusions	This policy would be expected to score very positively on the housing objective. It also shows a positive effect on the healthy lifestyle objective. On all the other objectives the policy scores as having no impact. The proposed modifications set out in MM35 propose a number of revisions to both supporting text and criteria c) and d). The justification for these modifications are to ensure the policy is effective and complies with the PPG as discussed at the hearing session. The modification to criterion c) introduces clarity as to what the proposed tenure split of the affordable homes delivered needs to be on a qualifying site. The modification to criterion d) reintroduces a threshold (now 3%) for the number of affordable homes that need to be provided. It is not considered that these proposed modifications change the thrust of the policy and its assessment against the SA objectives.

Objective	DM4 Gypsies, Travellers and Travelling Showpeople
	+

1. Environmental Quality	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.
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	+
	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.
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	/
	The policy requires that sites are not located on contaminated land, new refuse/landfill sites, wastewater treatment works, electricity pylons or be adversely affected by noise and odour to protect the health and wellbeing of residents.
10. Crime and Public Safety	0
	This policy will have no impact on this objective

11. Housing	+
	This policy will help meet the identified need of this particular group
12. Communities	/
	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.
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	+
	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,
Mitigation	None identified
Conclusions	This policy will have no impact on most objectives, a neutral impact on communities and a positive impact on environmental quality, water management, travel and access and as would be expected a positive impact for the housing objective. Proposed modification MM31 seeks to delete criterion b) and amend criterion c) and the changes are being proposed to avoid unnecessary wording and to ensure the policy is effective. It is not considered that the proposed modifications will result in any change to the impact of the policy on the objectives.

Objective	DM5 Quality of the Built Environment
	+

1. Environmental Quality	This policy will help ensure lighting does not cause light pollution
2. Biodiversity	+
	The policy supports the requirement to deliver net gains and will help ensure this is an integral part of design
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	+
	The policy will help ensure development respects and enhances the character of the site and the prevailing character of the area,
7. Built Environment	++
	This policy will strongly contribute to protecting the built character of the townscape and securing high quality design
8. Historic Environment	+
	This policy ensures that development respects preserves and enhances heritage assets and settings
9. Healthy Lifestyles	/
	This policy seeks to ensure that development does not have an unacceptable impact on occupiers of adjacent properties including unacceptable loss of privacy, sunlight or an increase in noise which could adversely affect physical and mental health and wellbeing
	+

10. Crime and Public Safety	This policy requires that developments should incorporate the principles of securing safety and reducing crime through design to create a safe and secure environment.
11. Housing	+
	The policy will ensure that new housing is well built, accessible and fit for purpose and adaptable.
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	+
	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.
Mitigation	None identified

Conclusions	<p>This policy scores as having a very positive effects for the built environment objective, positive effects for environmental quality, biodiversity, landscape and character, historic environment, crime & public safety, housing and travel and access objectives. A neutral effect has been scored for healthy lifestyles. No effects likely scored for the remaining objectives. Proposed modification MM37 seeks a number of amendments pertaining supporting text paragraphs 5.59, 5.64, 5.72 and 5.73. The proposed amendments to the supporting text have been made as a result of the discussions held during hearing sessions and to ensure that the supporting text is in accordance with the revised NPPF. Modifications have been made to criterion a) ii), a) iv), a) viii), a) ix) and c). An additional criterion (d) has been added. These amendments have been made to improve the effectiveness of the policy. The proposed modifications do not change the general thrust of Policy DM5 therefore it is considered that there is no change to the SA assessment for this policy.</p>
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Objective	DM6 Public Realm
1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	+
	This policy will enhance the character and distinctiveness of areas
	+

7. Built Environment	A well designed public realm will contribute to the quality of the built environment
8. Historic Environment	<div>/</div> <p>Where public realm is in close proximity to heritage assets it is important it relates to the local and historic context.</p>
9. Healthy Lifestyles	<div>+</div> <p>A high quality public realm will help provide outdoor space which will support health and wellbeing</p>
10. Crime and Public Safety	<div>+</div> <p>The policy states that proposals must ensure that the public realm is safe, accessible and inclusive</p>
11. Housing	<div>0</div> <p>This policy will have no impact on this objective</p>
12. Communities	<div>0</div> <p>This policy will have no impact on this objective</p>
13. Education	<div>0</div> <p>This policy will have no impact on this objective</p>
14. Economy	<div>?</div> <p>A high quality public realm may help to attract further investment and regeneration</p>
15. Town and Local Centres	<div>++</div> <p>An enhanced public realm in the town centre is identified within the policy as an integral part of the strategic objectives for the town.</p>
16. Travel and Access	<div>+</div> <p>This policy requires public realm to be accessible and recognises opportunities to improve the public realm through integrated sustainable transport schemes.</p>

Mitigation	Where public realm is in close proximity to heritage assets it is important it relates to the local and historic context.
Conclusions	This policy scores as having a very positive effects for town and local centres objective, positive effects for landscape and character, built environment, healthy lifestyles, crime & public safety, and travel and access objectives. A neutral effect has been scored for the historic environment. Uncertain effect scored for the economy. No effects likely scored for the remaining objectives. Proposed modification MM38 seeks a number of amendments pertaining criterion a), c), e) and f) to improve the clarity and effectiveness of the policy (as discussed during the hearing session) as well as responding to the representation received from the British Sign & Graphics Association (SDWLP-20). The modifications do not change the general thrust of policy DM6 and therefore it is considered that there is no change to the SA assessment for this policy.

Objective	DM7 Open Space, Recreation and Leisure
1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	+
	The policy affords protection to open spaces which have significant nature conservation value
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	?
	Open spaces may provide space for water but this policy doesn't specifically address this
	+

6. Landscape and Character	Resisting the loss of existing open space will help preserve local character.
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	+
	This policy affords protection to open spaces that have significant historical or cultural value
9. Healthy Lifestyles	++
	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.
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	-
	Safeguarding existing and the need to provide new open space as part of developments could restrict the amount of housing that can be delivered on a site.
12. Communities	+
	The provision of new open space and resisting the loss of existing open space or sports facilities will help maintain these important local resources for communities.
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
	0

15.Town and Local Centres	This policy will have no impact on this objective
16.Travel and Access	<div>+</div> <p>Open space can help support routes for active travel such as walking and cycling</p>
Mitigation	None identified
Conclusions	<p>This policy scores as having a very positive effect for healthy lifestyles objective, positive effects for biodiversity, landscape and character, historic environment, communities and travel and access objectives. A negative effect has been scored for housing. Uncertain effect scored for water management. No effects likely scored for the remaining objectives. Proposed modification MM39 seeks a number of amendments pertaining supporting text paragraphs 5.100 and 5.101. In addition, criterion a), b), c) iii have been amended with criterion e) deleted. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing session and in response to MIQ-188. The proposed modifications do not change the general thrust of Policy DM7 therefore it is considered that there is no change to the SA assessment for this policy.</p>

Objective	DM8 Planning for Sustainable Communities / Community Facilities
1. Environmental Quality	<div>0</div> <p>This policy will have no impact on this objective</p>
2. Biodiversity	<div>0</div> <p>This policy will have no impact on this objective</p>
3. Land and Soils	<div>0</div> <p>This policy will have no impact on this objective</p>
4. Energy	<div>0</div> <p>This policy will have no impact on this objective</p>
	0

5. Water Management	This policy will have no impact on this objective
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	+
	The provision of health and social facilities will support people's health and wellbeing
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	++
	The policy protects and supports improvements to a range of community facilities where they meet the needs of local communities.
13. Education	+
	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.
14. Economy	0
	This policy will have no impact on this objective
	0

15.Town and Local Centres	This policy will have no impact on this objective
16.Travel and Access	<div>+</div> <p>Community facilities and services that are located locally to the communities they serve could help reduce the need to travel.</p>
Mitigation	None identified
Conclusions	This policy will have no impact on most objectives however, it will very positively impact on communities as its aim is to protect existing and support the provision of new provision to meet communities needs. It will also positively impact on healthy lifestyles, education and travel and access. The proposed modifications set out at MM35 are primarily required to ensure that the policy is effective and for clarity. As such the intention of the policy remains the same and the assessment does not change.

Objective	DM9 Delivering Infrastructure
1. Environmental Quality	<div>+</div> <p>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.</p>
2. Biodiversity	<div>0</div> <p>This policy will have no impact on this objective</p>
3. Land and Soils	<div>0</div> <p>This policy will have no impact on this objective</p>
4. Energy	<div>?</div> <p>The policy will support the delivery of utility infrastructure to meet the needs generated by new development. However this may not necessarily be low or zero carbon energy.</p>
5. Water Management	<div>+</div> <p>The policy will ensure necessary environmental infrastructure is in place to support communities this will include flood management infrastructure.</p>
	0

6. Landscape and Character	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	?
	Depending on the type and location of new infrastructure there may be the potential for it to impact on the historic environment
9. Healthy Lifestyles	+
	Ensuring adequate infrastructure is in place to support communities is likely to help support health and wellbeing
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	+
	Adequate infrastructure provided in a timely manner will support and enable the delivery of new housing
12. Communities	+
	The policy will ensure that additional demands from development on local services and facilities will be provided for minimising the impact on local communities
13. Education	+
	The policy will support the provision of new education facilities to meet the needs of the local population.
14. Economy	+
	Ensuring the necessary infrastructure is in place will help support the local economy.
15. Town and Local Centres	0
	This policy will have no impact on this objective
	+

16.Travel and Access	Ensuring the necessary infrastructure is in place could help improve access to public transport.
Mitigation	None identified
Conclusions	<p>This policy scores positive effects for environmental quality, water management, healthy lifestyles, housing, communities, education, economy and travel and access. Uncertain effect scored for energy and historic environment. No effects likely scored for the remaining objectives.</p> <p>Proposed modification MM41 seeks a number of amendments pertaining supporting text paragraphs 5.115 & 5.123. In addition, criterion c) has been amended. An additional criterion (f) has been added. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions and in response to MIQ-155 and MIQ-156. The amendments are considered necessary to improve the effectiveness of the policy. The proposed modifications do not change the general thrust of Policy DM9 therefore it is considered that there is no change to the SA assessment for this policy.</p>

Objective	DM10 Economic Growth and Skills
1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	+
	The policy aims to make more efficient use of existing and underused and accessible employment sites
4. Energy	0
	This policy will have no impact on this objective
	0

5. Water Management	This policy will have no impact on this objective
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	0
	This policy will have no impact on this objective
10. Crime and Public Safety	?
	Improving skills and training and providing additional local jobs may reduce local unemployment rates which could subsequently reduce local crime.
11. Housing	-
	By meeting the identified needs of businesses and the provision of new employment floorspace is likely to be at the expense of housing delivery
12. Communities	+
	This policy aims to address local skills shortage and support skills development and training which may improve job opportunities for local communities.
13. Education	+
	This policy aims to support skills development and training which would have strong links with local education facilities.
	++

14. Economy	The policy seeks to promote economic development to enable the continued development of a strong sustainable and local economy
15.Town and Local Centres	<div>+</div> <p>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.</p>
16.Travel and Access	<div>+</div> <p>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.</p>
Mitigation	None identified
Conclusions	This policy is considered to have a positive impact on land and soils by virtue of making the most efficient use of land and on communities, education, town and local centres and travel and access. It will have no impact on a number and as would be expected a negative impact on housing but a very positive effect on the economy. There are no proposed changes to this policy, only a factual update in the supporting text to the policy, therefore there is no change to the assessment.

Objective	DM11 Protecting and Enhancing Employment Sites
1. Environmental Quality	<div>0</div> <p>This policy will have no impact on this objective</p>
2. Biodiversity	<div>0</div> <p>This policy will have no impact on this objective</p>
	/

3. Land and Soils	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.
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	0
	This policy will have no impact on this objective
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	-
	This policy will protect employment spaces at the expense of the delivery of new housing
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
	++

14. Economy	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
15.Town and Local Centres	<div>+</div> <p>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</p>
16.Travel and Access	<div>+</div> <p>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,</p>
Mitigation	The policy should allow for some flexibility to minimise the likelihood of vacant premises.
Conclusions	This policy has no impact on the majority of objectives but as would be expected it scores very positively under the economy objective. It has a positive impact on travel and access and on town and local centres. As would be expected it impacts negatively on the housing delivery objective. The proposed changes to the policy set out in main modification MM38 seek to improve the effectiveness of the policy and ensure matters are not deferred to an SPD. The changes do not change the primary purpose of the policy and as such there is no change to the assessment.

Objective	DM12 The Visitor Economy
1. Environmental Quality	<div>0</div> <p>This policy will have no impact on this objective</p>
2. Biodiversity	<div>0</div> <p>This policy will have no impact on this objective</p>
3. Land and Soils	<div>0</div> <p>This policy will have no impact on this objective</p>
	0

4. Energy	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	0
	This policy will have no impact on this objective
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
14. Economy	+
	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.
	+

15.Town and Local Centres	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.
16.Travel and Access	0
	This policy will have no impact on this objective
Mitigation	None identified
Conclusions	This policy scores positively for the economy and town and local centres as would be expected. The proposed modification as set out in MM39 seeks to improve the effectiveness of the policy but does not change the primary purpose of the policy and as such there are no changes to the assessment of the policy.

Objective	DM13 Retail and Town Centre Uses
1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	0
	This policy will have no impact on this objective
	0

7. Built Environment	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	0
	This policy will have no impact on this objective
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	+
	This policy supports the role of district and local centres in meeting the day to day needs of residents and contributing to social inclusion.
13. Education	0
	This policy will have no impact on this objective
14. Economy	+
	Supporting the vitality and viability of Worthing's town centres will support the tourism offer and benefit the local economy
15. Town and Local Centres	++
	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.
	+

16.Travel and Access	Protecting and enhancing the hierarchy of town centre's will enable local residents better access to goods and services without the need to travel.
Mitigation	None identified
Conclusions	This policy scores as having no impact on most objectives. As would be expected it scores very positively on town and local centres and positively on communities,economy and travel and access.The proposed modifications MM40 whilst setting out a number of changes they primarily seek to ensure that the policy is effective, justified, consistent with national policy and to improve its effectiveness. None of the proposed changes impact on the primary purpose of the policy and as such there are no changes to the assessment of the policy.

Objective	DM14 Digital Infrastructure
1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	0
	This policy will have no impact on this objective
	0

7. Built Environment	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	0
	This policy will have no impact on this objective
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	+
	This policy supports the provision of high quality digital infrastructure which can help enhance the provision of and online access to community facilities and services
13. Education	0
	This policy will have no impact on this objective
14. Economy	+
	This policy supports the provision of high quality digital infrastructure which can help support local economic growth.
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	0
	This policy will have no impact on this objective
Mitigation	None identified

Conclusions	This policy will have little impact on most of the objectives however there will be a positive impact on communities as it will expand easier access to a wider range of community facilities and services and for the economy due to the provision of high quality digital infrastructure which can help support local economic growth. The proposed modifications set out in MM41 do not alter the purpose and objectives of the policy but rather seek to ensure that the policy is clear and effective. As such there is no change in the assessment of this policy.
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Objective	DM15 Sustainable Transport & Active Travel
1. Environmental Quality	<p>+</p> <p>The policy aims to reduce the environmental impact of traffic movements and ensure new development contributes to the mitigation of air pollution particularly in AQMAs</p>
2. Biodiversity	<p>0</p> <p>This policy will have no impact on this objective</p>
3. Land and Soils	<p>0</p> <p>This policy will have no impact on this objective</p>
4. Energy	<p>+</p> <p>This policy supports the expansion and improvement of public transport services and requires new development to incorporate facilities for electric vehicle charging points which will support the transition from diesel and petrol cars which emit high carbon emissions.</p>
5. Water Management	<p>0</p> <p>This policy will have no impact on this objective</p>
6. Landscape and Character	<p>0</p> <p>This policy will have no impact on this objective</p>
	0

7. Built Environment	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	+
	Encouraging active travel and supporting the development of a network of high quality walking and cycling walks including better connectivity with the National Park and Green Infrastructure Network will help improve people's health and wellbeing
10. Crime and Public Safety	+
	This policy aims to create safer roads which will help improve public safety
11. Housing	0
	This policy will have no impact on this objective
12. Communities	+
	This policy promotes the location of new development in sustainable locations with good access to community services to reduce the need to travel by car.
13. Education	0
	This policy will have no impact on this objective
14. Economy	+
	This policy supports improvements to the road network, key arterial cycle routes and public transport interchanges which may help attract further inward investment.
15. Town and Local Centres	+
	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.
	++

16.Travel and Access	This policy aims to achieve a rebalancing of transport in favour of sustainable modes.
Mitigation	None identified
Conclusions	<p>This policy scores a very positive effect for the Travel and Access objective. Positive effects are scored for environmental quality, energy, healthy lifestyles, crime and public safety, communities, economy and town and local centres. No effects likely scored for the remaining objectives.</p> <p>Proposed modification MM47 seeks an amendment pertaining supporting text paragraph 5.233. In addition criterion a) iv), a) vii), a) viii) and b) viii) have been amended with criterion b) v) deleted. An additional criterion b) viii) has been added. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing session and in response to the Inspector's Initial Questions 27 & 28 and also to ensure consistency with the revised NPPF. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM15. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	DM16 Sustainable Design
1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	+
	This policy will have no direct impact on this objective although the provision of multifunctional green infrastructure may provide biodiversity net gain.
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	++
	This policy sets minimum requirements to reduce carbon emissions and implement energy efficiency measures.
5. Water Management	0
	This policy will have no impact on this objective

6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	?
	Some of the policy aims such as reducing carbon emissions may conflict or be incompatible with preservation of this historic environment particularly in relation to Listed Buildings.
9. Healthy Lifestyles	+
	This policy will help ensure homes are better adapted to the effects of climate change helping to minimise overheating.
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	?
	The minimum policy requirements may affect the cost of building houses which could affect the viability of some developments. This will be considered through the viability assessment.
12. Communities	+
	The implementation of energy efficiency measures will reduce the cost and need to heat or cool properties helping to address fuel poverty.
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	0
	This policy will have no impact on this objective
Mitigation	None identified

Conclusions	This policy scores a very positive effect for energy objective. Positive effects are scored for biodiversity, energy, healthy lifestyles and communities. Uncertain effects scored for historic environment and housing. No effects likely scored for the remaining objectives. Proposed modification MM48 seeks amendments pertaining criterion a) b), c) and f) An additional criterion b) viii) has been added. The proposed amendments to the policy criteria have been made as a result of the discussions held during the hearing sessions and in response to MIQ-174. The modifications seek to ensure that the residential policy requirements are consistent with the 2015 Written Ministerial Statement and non-residential requirements are consistent with the emerging future buildings standard. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM16. On this basis, it is considered that there is no change to the SA assessment for this policy.
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Objective	DM17 Energy
1. Environmental Quality	/
	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.
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	++
	This policy supports transition to zero carbon through proposals for the development of renewable, low carbon or decentralised energy schemes.
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	/
	The policy requires developments to be located appropriately and not cause an unacceptable impact on landscape character.
	0

7. Built Environment	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	0
	This policy will have no impact on this objective
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	0
	This policy will have no impact on this objective
Mitigation	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.
Conclusions	<p>This policy scores a very positive effect for energy objective. Neutral effects are scored for environmental quality and landscape and character. No effects likely scored for the remaining objectives. Proposed modification MM49 seeks an amendment pertaining criterion c). The proposed amendment to the policy criterion has been made as a result of the discussions held during the hearing sessions and to ensure consistency with the modifications made to Policy DM16.</p> <p>The modification is considered necessary for effectiveness to ensure that the policy is not overly prescriptive but they do not change the general thrust of Policy DM17. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	DM18 Biodiversity
1. Environmental Quality	<p>+</p> <p>The policy seeks biodiversity enhancements. Improving the quality of habitats is also likely to improve the quality of the wider environment.</p>
2. Biodiversity	<p>++</p> <p>This policy seeks to protect and enhance biodiversity, and achieve net gains.</p>
3. Land and Soils	<p>0</p> <p>This policy will have no impact on this objective</p>
4. Energy	<p>0</p> <p>This policy will have no impact on this objective</p>
5. Water Management	<p>?</p> <p>This policy is unlikely to have a direct impact on this objective. However the creation or enhancement of some wetland habitats may provide Natural Flood Management.</p>
6. Landscape and Character	<p>0</p> <p>This policy will have no impact on this objective</p>
7. Built Environment	<p>0</p> <p>This policy will have no impact on this objective</p>
8. Historic Environment	<p>0</p> <p>This policy will have no impact on this objective</p>
9. Healthy Lifestyles	<p>?</p> <p>This policy seeks to protect and enhance biodiversity, this may indirectly protect and enhance open spaces which provide opportunities for recreation.</p>
	0

10. Crime and Public Safety	This policy will have no impact on this objective
11. Housing	0
	The need to provide biodiversity net gains may result in less land available on a site for housing.
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	0
	This policy will have no impact on this objective
Mitigation	None identified
Conclusions	<p>This policy scores a very positive effect for biodiversity objective. A positive effect is scored for environmental quality. Uncertain effects scored for water management and healthy lifestyles. No effects likely scored for the remaining objectives. Proposed modification MM50 seeks an amendment pertaining supporting text paragraph 5.259. In addition criterion f) and h) have been amended. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing session and in response to MIQ-192 and the representation received from Sussex Wildlife Trust (SDWLP-57). The modifications also seek to ensure that the policy and supporting text reflect the Royal Assent of the Environment Act and Local Nature Strategies. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM18. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>

Objective	DM19 Green Infrastructure
1. Environmental Quality	+
	Enhancing green infrastructure assets may also improve environmental quality.
2. Biodiversity	+
	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.
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	+
	Green infrastructure includes watercourses and SuDS therefore this may further support proposals for SuDS and Natural Flood Management as part of developments.
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	+
	Incorporation of green infrastructure could improve the quality of developments and public realm.
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	+
	The creation of a green infrastructure network will join up open spaces and provide green corridors for people to enjoy for recreation.
10. Crime and Public Safety	0
	This policy will have no impact on this objective

11. Housing	0
	This policy will have no impact on this objective
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	+
	The creation of an integrated network of green infrastructure may indirectly create new routes for active travel.
Mitigation	None identified
Conclusions	This policy scores a positive effect for environmental quality, biodiversity, water management, built environment, healthy lifestyles and travel and access objectives. No effects likely scored for the remaining objectives. Proposed modification MM51 seeks amendments pertaining to supporting text paragraphs 5.271 and 5.277. In addition criterion a), b) and c) have been amended. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM19. On this basis, it is considered that there is no change to the SA assessment for this policy.
Objective	DM20 Flood Risk and Sustainable Drainage
1. Environmental Quality	/
	This policy should require the adequate treatment of water prior to discharge to protect and where possible improve water quality

2. Biodiversity	+
	Opportunities should be taken to increase biodiversity through the use of Sustainable Drainage Systems.
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	++
	The policy aims to ensure flood risk is safely managed and opportunities taken to promote Sustainable Drainage Systems and reduce flooding including any increase associated with climate change.
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	+
	Drainage schemes should be designed to promote an enhanced landscape or townscape and high quality public spaces.
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	+
	Ensuring the risks of flooding are safely managed will mean new development is less likely to flood thereby reducing the associated health risks and impact on wellbeing.
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	?
	The use of SuDS could reduce overall flood risk to the wider community.
	0

13. Education	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	0
	This policy will have no impact on this objective
Mitigation	This policy should require the adequate treatment of water prior to discharge to protect and where possible improve water quality .
Conclusions	This policy scores a very positive effect for water management objective. Positive effects are scored for biodiversity, built environment and healthy lifestyles objectives. Neutral effect is scored for environmental quality. Uncertain effect scored for communities. No effects likely scored for the remaining objectives. Proposed modification MM52 seeks amendments pertaining to supporting text paragraphs 5.280 and 5.282. In addition, criterion a), b) iii), c) i) and d) have been amended with new additional criterion c) ii) and c) vi). The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions, in response to the revised NPPF, in response to SWDLP-13 and in response to MIQ-181 and MIQ-182. The modifications are considered necessary to improve the effectiveness of the policy but they do not change the general thrust of Policy DM20. On this basis, it is considered that there is no change to the SA assessment for this policy.

Objective	DM21 Water Quality and Sustainable Water Use
1. Environmental Quality	++
	This policy seeks to ensure that development does not have an unacceptable impact on water quality and that it protects and enhances water quality.
2. Biodiversity	+
	This policy will benefit and improve water habitats that support biodiversity.

3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	++
	The policy sets water efficiency requirements to help adapt to climate change.
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	+
	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.
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	+
	This policy sets requirements for water efficiency measures that will reduce household water bills helping lower income households.
	0

13. Education	This policy will have no impact on this objective
14. Economy	0 This policy will have no impact on this objective
15. Town and Local Centres	0 This policy will have no impact on this objective
16. Travel and Access	0 This policy will have no impact on this objective
Mitigation	None identified
Conclusions	This policy scores a very positive effect for environmental quality and water management. Positive effects are scored for biodiversity, healthy lifestyles and communities objectives. No effects likely scored for the remaining objectives. Proposed modification MM53 seeks amendments pertaining criterion b) and e). The proposed amendments to the policy criteria have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy, ensure it is consistent with national policy and in response to MIQ-184. The modifications do not change the general thrust of Policy DM21. On this basis, it is considered that there is no change to the SA assessment for this policy.

Objective	DM22 Pollution
1. Environmental Quality	++ This policy seeks to ensure that development is not at risk from or results in unacceptable levels of pollution.
2. Biodiversity	+ This policy will help ensure that nature conservation interests are protected from pollution,
3. Land and Soils	++ This policy supports remediation of contaminated land

4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	0
	This policy will have no impact on this objective
7. Built Environment	0
	This policy will have no impact on this objective
8. Historic Environment	0
	This policy will have no impact on this objective
9. Healthy Lifestyles	+
	This policy will help protect human health from pollution or hazards.
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective

16.Travel and Access	0
	This policy will have no impact on this objective
Mitigation	None identified
Conclusions	This policy scores a very positive effect for environmental quality and land and soils objectives. Positive effects are scored for biodiversity and healthy lifestyles objectives. No effects likely scored for the remaining objectives. Proposed modification MM54 seeks amendments pertaining supporting text paragraph 5.313 and policy criterion a), b), d) and e). The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy, ensure it is consistent with the NPPF and new guidance and also in response to a representation received from SDWLP-60 (Rapleys on behalf of EM Goring Ltd). The modifications do not change the general thrust of Policy DM22. On this basis, it is considered that there is no change to the SA assessment for this policy.

Objective	DM23 Strategic Approach to the Historic Environment
1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	+
	The policy aims to conserve and enhance the historic environment including important views and relationships between settlements and landscapes/seascapes.
	+

7. Built Environment	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.
8. Historic Environment	++ This policy will conserve and enhance the historic environment and character of Worthing.
9. Healthy Lifestyles	0 This policy will have no impact on this objective
10. Crime and Public Safety	0 This policy will have no impact on this objective
11. Housing	0 This policy will have no impact on this objective
12. Communities	0 This policy will have no impact on this objective
13. Education	? The policy aims to encourage the best use of heritage assets in education. However it is unclear what the impact of this would be.
14. Economy	+ 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.
15. Town and Local Centres	0 This policy will have no impact on this objective
16. Travel and Access	0 This policy will have no impact on this objective
Mitigation	None identified

Conclusions	This policy scores a very positive effect for historic environment objective. Positive effects are scored for landscape and character, built environment and economy objectives. Uncertain effects scored for education. No effects likely scored for the remaining objectives. Proposed modification MM55 seeks an amendment pertaining policy criterion b) ii). The proposed amendment has been made as a result of the discussions held during the hearing sessions. The modification is considered necessary to improve the effectiveness of the policy and does not change the general thrust of Policy DM23. On this basis, it is considered that there is no change to the SA assessment for this policy.
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Objective	DM24 The Historic Environment
1. Environmental Quality	0
	This policy will have no impact on this objective
2. Biodiversity	0
	This policy will have no impact on this objective
3. Land and Soils	0
	This policy will have no impact on this objective
4. Energy	0
	This policy will have no impact on this objective
5. Water Management	0
	This policy will have no impact on this objective
6. Landscape and Character	+
	This policy aims to protect views that are demonstrably important to local character.
7. Built Environment	+
	The policy promotes high quality design respecting its context and demonstrating a sense of place.
	++

8. Historic Environment	The policy seeks to protect designated and undesignated heritage assets.
9. Healthy Lifestyles	0
	This policy will have no impact on this objective
10. Crime and Public Safety	0
	This policy will have no impact on this objective
11. Housing	0
	This policy will have no impact on this objective
12. Communities	0
	This policy will have no impact on this objective
13. Education	0
	This policy will have no impact on this objective
14. Economy	0
	This policy will have no impact on this objective
15. Town and Local Centres	0
	This policy will have no impact on this objective
16. Travel and Access	0
	This policy will have no impact on this objective
Mitigation	None identified

Conclusions	<p>This policy scores a very positive effect for historic environment objective. Positive effects are scored for landscape and character and built environment objectives. No effects likely scored for the remaining objectives. Proposed modification MM56 seeks amendments pertaining supporting text paragraph 5.328 and policy criterion c) and g) with criterion i) being deleted. The proposed amendments to the supporting text and policy criteria have been made as a result of the discussions held during the hearing sessions. The modifications are considered necessary to improve the effectiveness of the policy, ensure it is consistent with the NPPF and in response to MIQ - 171. The modifications do not change the general thrust of Policy DM24. On this basis, it is considered that there is no change to the SA assessment for this policy.</p>
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