

# WORTHING LOCAL PLAN 2020- 2036

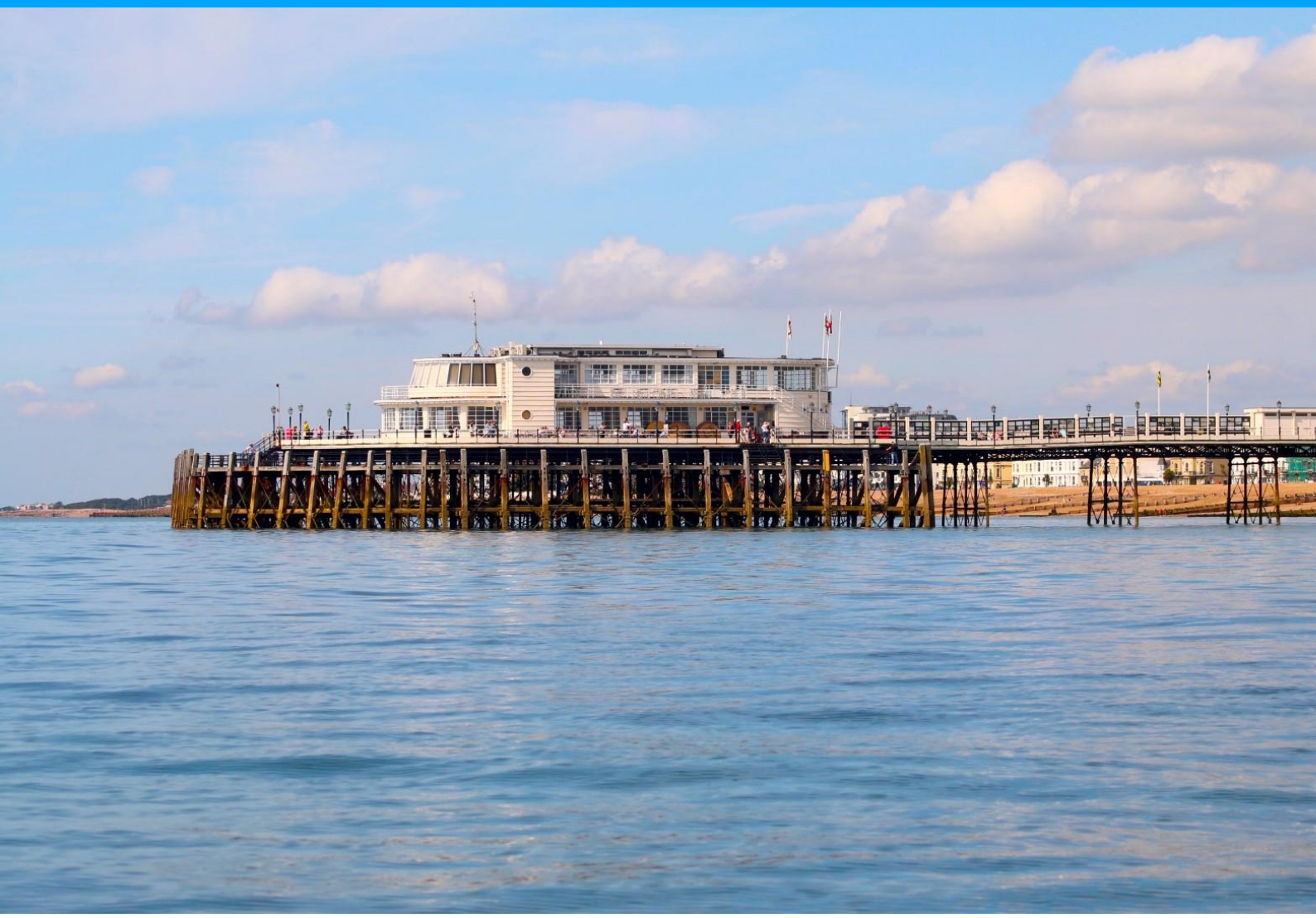
## Sustainability Appraisal For the Worthing Local Plan

### ADOPTION STATEMENT

March 2023



WORTHING BOROUGH  
COUNCIL



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## 1. Introduction

- 1.1 Worthing Borough Council has prepared a new Local Plan. It was formally submitted to the Secretary of State on 11th June 2021 for independent examination. Following an extensive Examination process, the Inspector's final report was issued to the Council on 14th October 2022. The report concludes that subject to the inclusion of a number of modifications listed in the report, the Submission Draft Worthing Local Plan is sound and legally compliant and provides an appropriate basis for planning in the borough. The Local Plan, incorporating modifications, was adopted at a Full Council meeting on 28th March 2023.
- 1.2 Strategic Environmental Assessment (SEA) is required by the Environmental Assessment of Plans and Programmes Regulations 2004, amended in 2020 (the 'SEA Regulations'), and Sustainability Appraisal (SA) is required by the Planning and Compulsory Purchase Act (2004), to ensure that sustainability considerations are integrated into the plan making process. In line with the guidance in the National Planning Practice Guidance, the Council met these requirements through a single appraisal process. Therefore throughout the remainder of this statement, reference to SA implies both SA and SEA.
- 1.3 SA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan-making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the Worthing Local Plan's contribution to sustainable development.
- 1.4 This document is the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) Adoption Statement to accompany the adoption of the Worthing Local Plan. In accordance with Regulation 16 of the SEA Regulations it explains:
  - how environmental (and sustainability) considerations have been integrated into the plan;
  - how the SA Report has been taken into account during preparation of the plan;
  - how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account;
  - the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
  - the measures that are to be taken to monitor the significant effects identified for the Local Plan.

## 2. How environmental and sustainability considerations have been integrated into the Worthing Local Plan

- 2.1 The main role of the Worthing Local Plan is to provide a strategy for sustainable development and change in Worthing up to 2036. It sets out the broad policy framework and a long-term spatial strategy to manage development, respond to climate change, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities.
- 2.2 The Local Plan replaces the Council's local planning policies set out in the Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003). It will inform the preparation of a number of future Supplementary Planning Documents (SPDs) and will be an important consideration in deciding planning applications. It will also inform related strategies and projects proposed by the Council, its partners and other stakeholders.
- 2.3 The new Local Plan will cover most of Worthing borough. However, it will not cover the land in the north of the borough that lies within the South Downs National Park.
- 2.4 The first stage of the SA process was the scoping stage. The Scoping Report (2015) set out information on relevant plans, strategies and programmes, to identify key sustainability issues for the Local Plan. These issues were used to inform a series of SA objectives that formed the SA Framework against which the emerging plan was assessed. The SA Framework was originally published in the 2015 Scoping Report and was then updated in response to consultation responses. The consultation bodies were subsequently reconsulted on the revised framework and methodology.
- 2.5 The SA Framework included environmental, social and economic objectives:

**Table 1: SA Objectives**

Objective
<b>1. Environmental Quality</b> To protect and improve air and water quality and reduce pollution.
<b>2. Biodiversity</b> To conserve, protect and enhance habitats and natural species diversity, green infrastructure networks and wildlife corridors.
<b>3. Land and Soils</b> Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials.
<b>4. Energy</b> To support the transition to achieving carbon neutrality, contributing to climate change mitigation.
<b>5. Water Management</b> To ensure water is effectively managed to adapt to the effects of climate change.
<b>6. Landscape and Character</b>

To protect and enhance landscape, the quality, character and appearance of the landscape, maintaining and strengthening local distinctiveness and sense of place.
<b>7. Built Environment</b> To protect the built character of the townscape and secure the delivery of high quality design.
<b>8. Historic Environment</b> To preserve and enhance the historic environment.
<b>9. Healthy Lifestyles</b> To help people live healthier lifestyles and reduce inequalities through physical activity and maximise health and well-being.
<b>10. Crime and Public Safety</b> To create safe sustainable environments which promote social cohesion, security and reduce fear of crime.
<b>11. Housing</b> To provide high quality homes for all (including affordable), which includes a range of size, types and tenures that are appropriate to local needs?
<b>12. Communities</b> 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.
<b>13. Education</b> Raise educational achievement and skills levels to enable current and future residents to remain in work, and access good quality jobs.
<b>14. Economy</b> To attract and sustain inward investment and support sustainable growth of industry to improve the resilience and diversity of the local economy.
<b>15. Town and Local Centres</b> Improve the range, quality and accessibility of wider town centre uses, and ensure the vitality and viability of existing centres.
<b>16. Travel and Access</b> Improve access to and from sustainable modes of transport.

2.6 The Local Plan has undergone various stages of preparation. These are described in more detail in section 3 of this report. At each stage the objections, options and / or policies have been appraised against the SA Framework to identify likely positive, negative and cumulative effects. This process has ensured environmental, social and economic considerations have been integrated into the Plan.

### 3. How the SA Report has been taken into account during preparation of the Worthing Local Plan

3.1 Preparation of the Local Plan has been an iterative process with options and policies being further refined at each stage. The table below shows the stages of plan preparation that have been undertaken and the equivalent SA. At each stage, where appropriate, the Worthing Local Plan was developed and modified to take into consideration the SA findings.

**Table 2: Stages of Local Plan and SA.**

Key Local Plan Stages	SA Stages and Outputs
<p><b>Your Town - Your Future (May 2016)</b></p> <p>This was the initial Local Plan consultation viewed as the first step in preparing a new Plan. This consultation identified the issues and challenges facing the borough and the options that could help address them.</p>	<p><b>Scoping (2015)</b></p> <p>Scoping is the first stage of the SA process. The purpose of the Scoping Report was to identify the scope and level of detail of the information to be included in the SA report. It set out the context, objectives and approach of the assessment; and identified relevant environmental, economic and social issues and objectives.</p> <p>The statutory consultation bodies (Historic England, Natural England and the Environment Agency) along with other interested parties were consulted on the draft Scoping Report (below) from Monday 16th March to Monday 20th April 2015.</p>
<p><b>Regulation 18 Draft Local Plan (October 2018)</b></p> <p>The Regulation 18 Draft Plan, that set out the Council's preferred options was published for consultation between 31st October and 12th December 2018. The Draft Local Plan set out the proposed strategy and policies to guide future development to 2033. It included the vision and strategic objectives, spatial strategy, Development Management policies, and a mixture of site allocations and areas of change</p>	<p><b>Draft Integrated Impact Assessment (2018)</b></p> <p>A Draft SA Report was undertaken to support the Draft Local Plan. This Integrated Impact Appraisal (IIA) incorporated SA, Equalities Impact Assessment and Health Impact Assessment. A Habitats Regulations Assessment Screening was also undertaken. The Draft Report presents the appraisal of the impacts of reasonable options and the Draft Local Plan.</p>
<p><b>Regulation 19 Submission Draft Local Plan (January 2021)</b></p> <p>The Regulation 19 consultation on the Submission Draft Worthing Local Plan ran for 8 weeks between Tuesday 26th January and Tuesday 23rd March 2021. The Local Plan provides the broad policy framework and a long-term spatial strategy to manage development, respond to climate change, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy</p>	<p><b>SA Report (2021)</b></p> <p>A SA Report of the Submission Draft Local Plan has been prepared. This is an integrated assessment also incorporating Health Impact Assessment and Equalities Impact Assessment. The SA Report assesses the likely significant effects of the Local Plan, proposes mitigation to minimise any negative effects, sets out how the appraisal has influenced the Local Plan and proposes a draft monitoring framework.</p>

<p>communities. The structure of this version of the Local Plan was amended to clearly distinguish strategic and non-strategic policies, it also amended the approach taken to sites with all sites included in this version of the plan being allocations.</p>	
<p><b>Examination</b></p> <p>Following the examination hearing sessions the Council received the Inspector's Initial Advice dated 9 December 2021 which included further Main Modifications and steps needed to make the Local Plan sound and legally compliant.</p>	<p><b>SA Note: Appraisal of Unmet Need (2021)</b></p> <p>This note was produced during the examination hearing sessions. It drew together the appraisals on unmet need undertaken in the DIIA and the SA Report.</p> <p><b>SA Report: Post Hearing Update (2022)</b></p> <p>This update responds to the Inspector's Initial Advice (IL07) that was received following the Local Plan examination hearings to more clearly explain why options were selected or rejected and to provide clearer cross referencing to the DIIA.</p>
<p><b>Main Modifications (2022)</b></p> <p>Following the close of the Hearing Sessions, in December 2021 the Council received the Inspector's Post Hearing Advice Letter (IL07) which sets out the proposed changes or Main Modifications (MMs) needed to ensure that the Worthing Local Plan is legally compliant and passes the government's tests of 'soundness'. The consultation on the Worthing Local Plan Main Modifications ran for 6 weeks between 5th April and 17th May 2022.</p>	<p><b>Addendum to the Submission SA Report: Proposed Main Modifications (2022)</b></p> <p>This SA Addendum considers the proposed Main Modifications to the Worthing Local Plan.</p>
<p><b>Adoption</b></p> <p>The Inspector's final report was issued to the Council on the 14th October 2022. The report concludes that, subject to the inclusion of a number of modifications listed in the report, the Submission Draft Worthing Local Plan is sound and legally compliant and provides an appropriate basis for planning in the borough.</p>	<p><b>SA Adoption Statement (2023)</b></p> <p>This report meets the requirements of Regulation 16 of the SEA Regulations.</p>

3.2 The SA Report comprises the SA Report (2021), SA Report: Post Hearing Update (2022) and the Addendum to the Submission SA Report: Proposed Main Modifications (2022).

3.3 The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. The tables below show the mitigation identified through the SA and a summary of how it has influenced the Local Plan.



**Table 3: Mitigation from 2018 Draft IIA Report**

<b>Policy</b>	<b>Recommendation</b>	<b>Outcome</b>
Review of Objectives	Policies should seek to reduce the need to travel by car, promote and enable sustainable forms of travel, should specify how resources should be used sustainably and should seek to reduce various forms of pollution.	DM15 DM22
	Policies should seek to protect and enhance biodiversity and encourage the incorporation of multi-functional biodiverse design features.	DM18 DM19
	Policies should seek to make the best use of brownfield sites through maximising densities where suitable and appropriate.	DM2
	Policies should seek to minimise greenhouse gas emissions through incorporation of energy efficient design features and support for incorporation of low/zero carbon sources of energy.	DM16 DM17
	Policies should specify how development should be resilient to the impacts of climate change and should promote sustainable resource use. Policies should take into account the risk of various types of flooding and seek to minimise flood risk.	SP2 DM16 DM20 DM21
	Policies should seek to protect landscape character and promote high quality and sensitive design.	SS4 SS5 DM5
	Policies should seek to enhance and preserve the historic built environment and promote high quality and sensitive design.	DM23 DM24
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.	SS1 SS2
	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure including education provision.	DM8
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs and allowing and enabling economic growth.	DM10 DM11
Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure.	DM9	
SP2 Spatial Strategy	The policy could be more explicit in specifically promoting new employment uses as part of development.	SS1 SS2
AOC1 Centenary House	High quality redevelopment and improved public realm within this prominent site could provide a positive outcome when assessed against the Built Environment objective.	A3
AOC4 Worthing Leisure Centre		This site has not been taken forward due to lack of certainty around

		delivery and timescales
AOC5 HMRC Offices, Barrington Road		A8
CP1 Housing Mix and Quality	Policy wording should ensure that accessibility standards only apply where feasible and viable to reduce some of the identified potential negative and uncertain impacts.	DM1
CP2 Density	The impact of imposing minimum space standards on viability should be considered.	DM2 b)
CP7 Healthy Communities	The positive effects could be maximised by making specific reference to reducing pollution	SP3 v.
CP12 employment Sites	To avoid the potential negative effects resulting from vacant properties, wording should be included in the policy to allow the release of those sites that are genuinely redundant or vacant for long periods.	DM11 d)
CP17 Sustainable Design	This policy should be informed by viability work to understand the potential impact on the delivery of smaller sites. It should also include allowances for historic buildings as some measures to reduce emissions may not be appropriate.	DM16 5.236

**Table 4: Mitigation from SA Report of the Submission Draft Local Plan**

<b>Policy / Topic</b>	<b>Recommendation</b>	<b>Outcome</b>
SP2 Climate Change	<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>	<p>Para 5.236</p> <p>SP2 j)</p>
SP3 Healthy Communities	To maximise positive effects the policy should make reference to fuel poverty, and more generally the need to address inequalities and climate justice.	SP3 b) v.
SS1 Spatial Strategy	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.	DM15, DM18, DM16, DM17, DM21, DM23 DM24.
SS2 Site Allocations	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.	SS2 a) and b)

SS3 Town Centre	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.	SS3 c) d) and e)
SS4 Countryside and Undeveloped Coast	The appraisal has identified that the positive effects associated with biodiversity could be further maximised by policy wording to improve and enhance green infrastructure.  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	SS4 e)  SS4 e)
SS5 Local Green Gaps	The policy scores neutral against the biodiversity objective. Positive effects could be maximised by the policy wording referring to enhancing Green Infrastructure networks. This could also provide positive benefits against the communities, health and travel objectives.	SS5 iv)
SS6 Local Green Spaces	Positive effects against the biodiversity objective could be further maximised by the policy encouraging these sites to be managed for biodiversity.	SS6
A1 Beeches Avenue	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.  To minimise negative effects on biodiversity as a result of loss, biodiversity should be enhanced to achieve net gains.  To ensure no negative effects against the water management objective a SuDs scheme should be delivered as part of development.  To maximise positive effects on healthy lifestyles and Travel objectives walking links and access into the National Park should be improved.	A1 c)  A1 h) and DM18  A1 f)  A1 b)
A2 Caravan Club, Titnore Way	To minimise negative effects on biodiversity as a result of loss, biodiversity should be enhanced to achieve net gains.  To ensure no negative effects against the water management objective a SuDs scheme should be delivered as part of development.  To minimise negative effects on landscape & character boundary vegetation should be enhanced to limit views of the site from the National Park.	A2 e)  A2 c) and DM20  A2 a)
A3 Centenary House	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.	DM20
A4 Civic Centre, Stoke Abbott Road	To minimise negative effects against the water management objective a SuDs scheme should be delivered as part of development.	DM20

	<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>	<p>A4 e)</p> <p>A4 b)</p>
A5 Decoy Farm	<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 &amp; 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>	<p>A5 a) h)</p> <p>DM18, A5 k)</p> <p>A5 a), c), d), h), j)</p> <p>A5 b)</p> <p>A5 e)</p>
A6 Fulbeck Avenue	<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 &amp; character woodland should be retained and enhanced to minimise the impact on views from the National Park.</p>	<p>A6 a)</p> <p>A6 c), d)</p> <p>A6 a)</p>
A7 Grafton	<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>	<p>A7 b), c)</p> <p>A7 f)</p> <p>A7 h)</p>
A8 HMRC Offices, Barrington Road	<p>Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme.</p> <p>Maximise positive effects on travel by improving access to and from Durrington Station.</p>	<p>DM20</p> <p>A8 g)</p>

A9 Lyndhurst Road	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.	A9 c) A9 g)
A10 Martlets Way	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme.	DM20
A11 Stagecoach, Marine Parade	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.  To minimise negative effects against the historic environment development should be sensitive to nearby assets and help to enhance their setting.  To maximise positive effects on travel and access development should provide attractive and accessible pedestrian links between the seafront and Warwick Street.	A11 c)  A11 f) g)  A11 h)
A12 Teville Gate	To minimise negative effects against the water management a SuDS scheme should be developed to reduce overall risk.  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.  To maximise positive effects on travel and access development should provide pedestrian and cycle routes from the station to the town centre and Morrisons.	A12 c)  A12 d) e)  A12 f)
A13 Titnore Lane	To minimise negative effects against the biodiversity objective Ancient Woodland should be protected with buffers and onsite biodiversity enhanced to achieve net gains.  To minimise negative effects against the water management objective a SuDS scheme should be developed to reduce overall risk.  To minimise negative effects against the landscape and character objective visual screening from the National Park should be maintained and enhanced.  To maximise positive effects against the health and travel objectives walking links and access to the National Park should be improved.	A13 b) c) d) e) g)  A13h)  A13 f)  A13 b)
A14 Union Place	To minimise negative effects against the water management objective a SuDS scheme should be developed to reduce overall risk.  To minimise negative effects against the historic environment objective development should ensure it protects and enhances nearby heritage assets.	DM20  A14 b)
A15 Upper Brighton Road	To minimise negative effects on environmental quality development should be required to incorporate measures that	A15 l)

	<p>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>	<p>A15 b)</p> <p>DM20 A15 e)</p> <p>A15 d) p) q)</p> <p>A15 e)</p> <p>A15 k) o)</p> <p>A15 k)</p>
DM2 Density	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.	DM2 a) i)
DM6 Public Realm	Where public realm is in close proximity to heritage assets it is important it relates to the local and historic context.	DM6 b)
DM11 Protecting and Enhancing Employment Sites	The policy should allow for some flexibility to minimise the likelihood of vacant premises.	DM11 d)
DM17 Energy	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.	DM17 d)
DM20 Flood Risk and Sustainable Drainage	This policy should require the adequate treatment of water prior to discharge to protect and where possible improve water quality.	DM20 d) iv)

The SA has been fully integrated into the process of plan production. Policies and sites, along with reasonable alternatives, have been assessed against the SA framework in order to establish the positive and negative effects that could result. This has enabled a comparative assessment of options to be undertaken, a cumulative assessment of impacts and the identification of mitigation to enhance policies and minimise negative effects. The results of the appraisals were used to inform the decision making process.

#### **4. How the opinions expressed during consultation have been taken into account.**

- 4.1 There have been three main stages of widespread public and stakeholder consultation on the Local Plan plus consultation on the Main Modifications.
- 4.2 Consultation was always in accordance with the relevant Town & Country Planning Regulations and the council's adopted Statement of Community Involvement. Specifically, in accordance with Regulation 13 of the SEA Regulations, consultation always included the three statutory environmental bodies; Natural England, the Environment Agency and Historic England.
- 4.3 The SA was consulted on alongside consultation on the draft Plan at every stage, including the consultation on Main Modifications after the hearings had concluded. All comments and representations were taken into account and used to further refine both the Plan and the SA. All comments received, at all stages of Local Plan preparation, including those that referred to the accompanying SA were made available online after the consultation had concluded. All consultations were undertaken in accordance with the national requirements and with the Council's Statement of Community Involvement (SCI). In addition following consultation at each stage a consultation report and summary of representations was prepared which provided a summary of the comments received and an officer response.
- 4.4 Representations received in response to consultation on the SA Scoping Report (16 March to 20 April 2015) resulted in updates to the baseline, context and significant changes to the SA Framework. As a result of this further consultation was undertaken on the revised SA Framework and methodology (7 March to 15 April 2016) the comments received helped to further refine the criteria that supported the SA objectives. No responses were received on the SA Scoping Report during the Local Plan Issues and Options Consultation 11 May to 22 June 2016.
- 4.5 The Draft IIA Report was published alongside the Draft Worthing Local Plan (31<sup>st</sup> October – 12<sup>th</sup> December 2018). The Summary of Representations Report (March 2019) reported that only one representation made specific points on the SA; these were mostly related to the consideration of reasonable alternatives and the potential viability impacts of policy requirements. The office response made clear that the SA Report will be updated to accompany the next stage of the Plan. This will include appraisals of further options identified through this consultation and as a result of new evidence produced.
- 4.6 At the Submission Draft Local Plan stage (26th January - 23rd March 2021), four representations were received which specifically refer to the SA. A Regulation 22 Consultations Statement (May 2021) was prepared for submission of the Local Plan to the Secretary of State which summarised the responses received and how the comments have been taken into account by the Council. Overall officers maintained that it is unclear what alternative approaches to development have been proposed that have not already been consulted on and tested within the SA. All potential sites have been robustly and positively assessed (including the partial development of sites) and there is clear evidence provided as to why sites that aren't allocated for residential

development are either protected or allocated for alternative uses. All available sites suitable for development have been allocated.

- 4.7 Only one representation was received at the Main Modifications stage relating to the SA report Update highlighting that in their opinion it does not fully address the Inspectors concerns. Officers responded stating that the additional work undertaken clearly responds to the issues raised by the Inspector and other parties before and during the Examination hearing sessions.



## **5. The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives**

- 5.1 The Worthing Local Plan was prepared in an iterative way with the SA as well as other evidence and consultation responses, informing plan production at each stage. National Planning Practice Guidance explains that the role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. By doing so it can help make sure the proposals in the plan are appropriate given the reasonable alternatives.
- 5.2 In-line with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present an appraisal of “reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” whilst in-line with Schedule 2(8) there is a need to explain “the reasons for selecting the alternatives dealt with. Alternatives should be reasonable, realistic, deliverable and sufficiently distinct to enable meaningful comparisons to be drawn.
- 5.3 Section 3 of the SA Report: Post Hearing Update (2022) draws together existing evidence on the identification and selection of preferred options and explains how the Local Plan strategy and policies have evolved. It ensures that along with the rest of the Submission SA Report, the reasons for selecting or rejecting alternatives are clear.
- 5.4 The lack of available land and need to be consistent with national policy meant that very few reasonable alternatives were identified for the Local Plan. Despite this a number of limited options were identified at the Draft Local Plan stage and appraised in the Draft Integrated Impact Assessment (2018). The results of these appraisals and justification for choosing the plan as adopted in light of the other reasonable alternatives are also included in the SA Report: Post Hearing Update (2022). These options included the use of designations to protect sensitive and valued areas of land, as well as options to understand the potential impacts of meeting more of the local housing needs.

### **Submission Draft Local Plan**

- 5.5 Following consultation on the Draft Local Plan, a significant amount of work was done to refine and develop the Plan in response to representations made during consultations and to take account of the updated evidence and reforms to national planning policy and associated guidance.
- 5.6 To respond to the Council’s declaration of a climate emergency a new Strategic Objective and Strategic Policy SP2 Climate Change were included. In addition, following best practice, the requirements of a number of policies were strengthened to help make the borough more resilient in the future from the challenges presented by climate change. In addition a new policy SS3 Town Centre was introduced.

- 5.7 In relation to sites, Worthing Leisure Centre was not taken forward as an allocation due to significant uncertainty regarding the scope of development and timescales for delivery. However, two omission sites were included as allocations and a number of site capacity figures were updated.
- 5.8 It is important to note that although the total housing supply figure changed, the Local Plan policy continued to follow the same strategy approach to setting the housing requirement as Option 3 that was originally tested in the DIIA (i.e. to allocate sites that were recommended as suitable for development by the evidence).
- 5.9 These along with all policies were appraised as part of the total effects of the Plan in the SA Report. No reasonable alternatives were identified.

### **Main Modifications**

- 5.10 The Worthing Local Plan was submitted for Examination in June 2021. Further to discussions held during the Hearing sessions, the Inspector's Post Hearing Advice Letter (IL07) indicated that Main Modifications are necessary to make the Plan sound and legally compliant.
- 5.11 No alternatives were put forward to the proposed modifications as they were proposed to ensure legal compliance and soundness. Therefore the do-nothing option was also not considered a reasonable alternative at this stage, particularly for those modifications that were in response to publication of the 2021 NPPF. No additional mitigation is proposed as a result of the Proposed Modifications.
- 5.12 The appraisals of the Main Modifications showed changes in the scoring of 6 policies against the sustainability objectives. In addition it was noted that the deletion of allocation A13 Titnore Lane would alter the total effects of the Local Plan as those effects that were associated with this allocation will no longer apply. However, although some of the appraisals changed, the cumulative impacts arising from the implementation of the Worthing Local Plan (with proposed modifications) were not considered to be significantly different to those identified at Publication stage.

**6. The measures that are to be taken to monitor the significant environmental and sustainability effects of the Plan**

- 6.1 The Local Plan provides the broad policy framework and a long-term spatial strategy to manage development, respond to climate change, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities.
- 6.2 It is a requirement of the SEA Directive that the significant effects of a plan or programme are monitored. The aim of SEA/SA monitoring is to check whether the plan is having the significant effects that were predicted in the SA, and to deal with any unforeseen problems.
- 6.3 The monitoring will be undertaken on an annual basis, where possible, and will be incorporated into the wider annual monitoring and presented in the Annual Monitoring Report for Worthing Borough Council. The monitoring framework sets out the SA Objectives and Local Plan policies against the United Nations Sustainable Development Goals (UN SDGs). It contains indicators to gauge the effectiveness of the Local Plan policies, and in many cases, specific targets to be achieved. Where policies are delivering a more ‘qualitative’ outcome, it will be necessary to assess general trends in outcomes, rather than specific targets. There may be some indicators which cannot be measured annually, and these will be monitored according to the timescales which are appropriate. Where relevant, the reporting will show where a situation has improved, stayed the same, or become worse, compared to the previous year’s data.
- 6.4 The findings of this ongoing monitoring reporting process will assist the council in measuring how well the Plan contributes towards sustainable development, and will also inform future reviews of the plans and policies contained within the Local Plan.

**Table 5: Monitoring Indicators**

UN Sustainable Development Goal	Relevant target	Related Local Plan Policies	Related SA Objectives	Local Plan Monitoring Indicators
SDG 1: No Poverty	1.1 1.2 1.3 1.4 1.5	SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM1: Housing Mix DM3: Affordable Housing	1. Environmental Quality 12. Communities	<ul style="list-style-type: none"> <li>● Overcrowded households (PH England)</li> <li>● Affordability of home ownership (PH England)</li> <li>● Affordable homes delivered (WSCC data)</li> <li>● Planning applications that achieve Nationally Described Space Standards</li> </ul>

		DM4: Gypsy & Traveller & Travelling Showpeople DM10: Economic growth and skills DM16: Sustainable Design		<ul style="list-style-type: none"> <li>Proportion of new homes built to Building Regulations Standard M4(2)</li> <li>Developments exceeding 100dph Amount of affordable housing provided</li> </ul>
SDG 2: Zero Hunger	2.4	SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM7: Open Space, Recreation & Leisure DM19: Green Infrastructure DM20: Flood risk and sustainable drainage		<ul style="list-style-type: none"> <li>Obesity profile (PH England)</li> </ul>
SDG 3: Good Health and Wellbeing	3.6 3.8 3.9	SP3: Strategic Policy on Healthy Communities DM2: Density DM8: Planning for sustainable communities / community facilities DM9: Delivering Infrastructure DM15: Sustainable Transport & Active Travel DM22: Pollution	3. Land and Soils 10. Crime and Public Safety 12. Communities	<ul style="list-style-type: none"> <li>Obesity profile (PH England)</li> <li>Percentage of adults walking for travel at least three days per week (PH England)</li> <li>Percentage of adults cycling for travel at least three days per week (PH England)</li> <li>Life expectancy at birth (male and female) (PH England)</li> <li>Air pollution: fine particulate matter (PH England)</li> <li>Air quality statistics from AQ Annual Status Report</li> <li>Planning applications that achieve Nationally Described Space Standards</li> </ul>
SDG 4: Quality Education	4.2 4.3 4.4 4.7 4.A	SP3: Strategic Policy on Healthy Communities DM8: Planning for sustainable communities / community facilities DM9: Delivering Infrastructure DM10: Economic growth and skills	13. Education	<ul style="list-style-type: none"> <li>Qualifications (Nomis)</li> </ul>
SDG 5: Gender Equality	5.2 5.4 5.B 5.C	DM5: Quality of the built environment DM9: Delivering Infrastructure DM14: Digital Infrastructure	10. Crime and Public Safety	n/a
SDG 6: Clean Water and Sanitation	6.1 6.3 6.4 6.5	SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM9: Delivering Infrastructure DM16: Sustainable Design	1. Environmental Quality 2. Biodiversity 5. Water Management	<ul style="list-style-type: none"> <li>Bathing water profile (EA)</li> </ul>

	6.6	DM18: Biodiversity DM19: Green Infrastructure DM20: Flood risk and sustainable drainage DM22: Pollution		
SDG 7: Affordable and Clean Energy	7.1 7.2 7.3	SP2: Strategic Policy on Climate Change DM9: Delivering Infrastructure DM16: Sustainable Design DM17: Energy	4. Energy	<ul style="list-style-type: none"> <li>● Fuel Poverty (PH England)</li> <li>● The BEIS Renewable Energy Planning Database</li> <li>● The Regional Renewable statistics</li> <li>● Non-residential buildings built to BREEAM standards</li> <li>● New housing achieving a 31% carbon reduction</li> <li>● Proportion of new build housing achieving an A rating EPC</li> <li>● Proportion of non-domestic buildings achieving a B rating EPC</li> </ul>
SDG 8: Decent Work and Economic Growth	8.2 8.3 8.4 8.5 8.6 8.9	SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM10: Economic growth and skills DM12: The visitor economy DM14: Digital Infrastructure DM16: Sustainable Design	13. Education 14. Economy 15. Town and Local Centres	<ul style="list-style-type: none"> <li>● Employment and unemployment (Nomis)</li> <li>● Economic inactivity (Nomis)</li> <li>● Workless households (Nomis)</li> <li>● Employment by occupation (Nomis)</li> <li>● Businesses (PH England)</li> </ul>
SDG 9: Industry, Innovation and Infrastructure	9.1 9.4 9.5	SP2: Strategic Policy on Climate Change DM8: Planning for sustainable communities / community facilities DM9: Delivering Infrastructure DM10: Economic growth and skills DM14: Digital Infrastructure DM16: Sustainable Design DM17: Energy	12. Communities	n/a
SDG 10: Reduced Inequalities	10.2	SP1: Presumption in favour of Sustainable Development		<ul style="list-style-type: none"> <li>● Access to Healthy Assets &amp; Hazards Index (PH England)</li> <li>● Life expectancy at birth (male and female) (PH England)</li> </ul>

<p>SDG 11: Sustainable Cities and Communities</p>	<p>11.1 11.2 11.3 11.4 11.5 11.6 11.7 11A 11B</p>	<p>SP1: Presumption in favour of Sustainable Development SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities SS1: Overarching Spatial Strategy SS2: Development Sites SS4: Countryside and undeveloped coast SS5: Local Green Gaps SS6: Local Green Spaces DM1: Housing Mix DM3: Affordable Housing DM5: Quality of the built environment DM6: Public Realm DM7: Open Space, Recreation &amp; Leisure DM9: Delivering Infrastructure DM15: Sustainable Transport &amp; Active Travel DM16: Sustainable Design DM17: Energy DM18: Biodiversity DM19: Green Infrastructure DM20: Flood risk and sustainable drainage DM21: Water quality and sustainable water use DM22: Pollution DM23: Strategic Approach to the Historic Environment DM24: The Historic Environment</p>	<p>1. Environmental Quality 3. Land and Soils 6. Landscape and Character 7. Built Environment 8. Historic Environment 9. Healthy Lifestyles 10. Crime and Public Safety 11. Housing 12. Communities 16. Travel and Access</p>	<ul style="list-style-type: none"> <li>● Percentage of dwellings on PDL (WSCC data)</li> <li>● Total amount of employment floorspace on PDL (WSCC data)</li> <li>● Additional floorspace in the town centre (WSCC data)</li> <li>● Additional employment floorspace (WSCC data)</li> <li>● Estimated dwellings lost (WSCC data)</li> <li>● Density of development (WSCC data)</li> <li>● Percentage of dwellings on PDL (WSCC data)</li> <li>● Listed Buildings on English Heritage 'Heritage at Risk' register (English Heritage)</li> <li>● Proportion of new homes built to Building Regulations Standard Regulation M4(2)</li> <li>● Developments exceeding 100dph</li> <li>● Amount of affordable housing provided</li> <li>● provision of open space on schemes of 10+ dwellings</li> <li>● Non-residential buildings built to BREEAM standards</li> <li>● New housing achieving a 31% carbon reduction</li> <li>● Proportion of new build housing achieving an A rating EPC</li> <li>● Proportion of non-domestic buildings achieving a B rating EPC</li> <li>● Planning applications that achieve a percentage of Biodiversity Net Gain</li> <li>● New housing with water use limited to below 110 l/p/d and below 100 l/p/d</li> </ul>
<p>SDG 12: Responsible Production and Consumption</p>	<p>12.2 12.4 12.5 12.8 12.B</p>	<p>SP1: Presumption in favour of Sustainable Development SP2: Strategic Policy on Climate Change DM12: The visitor economy DM16: Sustainable Design DM22: Pollution</p>	<p>4. Energy</p>	<ul style="list-style-type: none"> <li>● Recycling statistics (waste data flow)</li> <li>● Air pollution: fine particulate matter (PH England)</li> <li>● Air quality statistics from AQ Annual Status Report</li> <li>● Non-residential buildings built to BREEAM standards</li> <li>● New housing achieving a 31% carbon reduction</li> <li>● Proportion of new build housing achieving an A rating EPC</li> </ul>

				<ul style="list-style-type: none"> <li>● Proportion of non-domestic buildings achieving a B rating EPC</li> </ul>
SDG 13: Climate Action	13.1 13.2	SP1: Presumption in favour of Sustainable Development SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM5: Quality of the built environment DM7: Open Space, Recreation & Leisure DM9: Delivering Infrastructure DM15: Sustainable Transport & Active Travel DM16: Sustainable Design DM17: Energy DM18: Biodiversity DM19: Green Infrastructure DM20: Flood risk and sustainable drainage DM21: Water quality and sustainable water use DM22: Pollution	5. Water Management 9. Healthy Lifestyles	<ul style="list-style-type: none"> <li>● Carbon emissions reduction annual report</li> <li>● Developments granted planning permission contrary to EA advice</li> <li>● Non residential buildings built to BREEAM standards</li> <li>● New housing achieving a 31% carbon reduction</li> <li>● Proportion of new build housing achieving an A rating EPC</li> <li>● Proportion of non-domestic buildings achieving a B rating EPC</li> <li>● Planning applications that achieve a percentage of Biodiversity Net Gain</li> <li>● New housing with water use limited to below 110 l/p/d and below 100 l/p/d</li> </ul>
SDG 14: Life Under Water	14.1 14.2	SP2: Strategic Policy on Climate Change DM18: Biodiversity DM22: Pollution	1. Environmental Quality 2. Biodiversity	<ul style="list-style-type: none"> <li>● Water Body Status Classification (EA Catchment Planning)</li> </ul>
SDG 15: Life on Land	15.1 15.5 15.9	SP2: Strategic Policy on Climate Change DM18: Biodiversity DM19: Green Infrastructure DM20: Flood risk and sustainable drainage	2. Biodiversity	<ul style="list-style-type: none"> <li>● Planning applications within or abutting designated site, reserve or habitat (Biodiversity annual report)</li> <li>● Planning applications that achieve a percentage of Biodiversity Net Gain</li> </ul>
SDG 16: Peace, Justice and Strong Institutions	16B	SP1: Presumption in favour of Sustainable Development		n/a
SDG 17 Partnerships for the Goals	17.14	SP1: Presumption in favour of Sustainable Development		n/a

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