National Planning Policy Framework (NPPF) and Worthing Core Strategy Conformity Assessment

The report analyses the extent of conformity between the National Planning Policy Framework (NPPF) and the Worthing Core Strategy and assesses the potential risks incompatibility may create.

November 2012
Contents

Introduction 4
  Worthing Context 5
  PAS Assessment 5
  Planning Policy for Traveller Sites 6
  Report Layout 6
  Risk Level 7

Part 1 – Achieving Sustainable Development 9
  Presumption in favour of Sustainable Development 9

Part 2 – Delivering Sustainable Development 15
  Building a strong, competitive economy 15
  Ensuring the vitality of town centres 18
  Supporting a prosperous rural economy 26
  Promoting sustainable transport 27
  Supporting high quality communication infrastructure 29
  Delivering a wide choice of high quality homes 30
  Requiring good design 36
  Promoting healthy communities 39
  Protecting Green Belt land 42
  Meeting the challenge of climate change, flooding and coastal change 43
  Conserving and enhancing the natural environment 46
  Conserving and enhancing the historic environment 51
  Facilitating the sustainable use of minerals 54

Part 3 – Planning Policy for Traveller Sites 56
  A. Using evidence to plan positively and manage development 56
  B. Planning for traveller sites 58
  C. Sites in rural areas and the countryside 60
  D. Rural exception sites 60
  E. Traveller sites in Green Belt 60
  F. Mixed planning use traveller sites 61
  G. Major development projects 61

Part 4 – Plan Making 63
  Local Plans 63
  Using a proportionate evidence base 66
  Examining Local Plans 69

Conclusion 71
Outcomes 71

Appendices 73
  Appendix 1 - Summary of Worthing Core Strategy and NPPF Conformity 73
  Appendix 2 - Summary of risks and how these risks will be mitigated 75
  Appendix 3 – List of Contents, Strategic Objectives, Policies and Areas of Change in Worthing Core Strategy 77
Introduction

The Government is reforming the planning system to make it less complex and more accessible whilst at the same time seeking to protect the environment and promote sustainable growth. The National Planning Policy Framework (NPPF), which was published in March 2012, is a key part of this change as it consolidates a set of national priorities and objectives that must be considered when planning for and deciding on new development.

The NPPF, which establishes a presumption in favour of sustainable development, aims to strengthen local decision making and reinforces the importance of up-to-date plans. Although the planning system has changed in many ways, a key principle still remains that planning permission must be determined in accordance with the relevant Development Plan, unless material considerations indicate otherwise. The NPPF sets out the new legislation that Local Plans or Core Strategies must comply with and is a material consideration in planning decisions. For this reason, any emerging plans need to meet with the requirements of the NPPF and any existing plans need to be reviewed to assess their level of conformity.

However, guidance is clear in that policies in the existing Local Plans / Core Strategies should not be considered out-of-date simply because they were adopted prior to the publication of the NPPF. For those local authorities, such as Worthing, that have adopted Local Plans / Core Strategies after 2004 and prior to the publication of the NPPF, the Government has provided a 12 month adjustment period (to March 2013) in order for local authorities to ensure that their existing policies are in line with the new NPPF:

‘For 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework. (para 214)’

After March 2013, those Plans and policies that are of limited compatibility will be at risk:

‘due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given (para 215)’.

As such, Local Plans / Core Strategies may need to be revised to take into account changes in this Framework to ensure that full weight can be given to their policies. Any amendments required could be made through the preparation of a new Development Plan, a partial review of the existing plan or the advancement of ancillary guidance.

This report now sets out the approach and processes Worthing Council has undertaken in order to address this issue.
Worthing Context

The Worthing Core Strategy was adopted in April 2011. It is the key document in the Worthing’s Local Development Framework and sets out the overall vision and strategy for place-making. It provides the context for all subsequent Local Development Documents and their policies. The Core Strategy was written to be consistent with the national policy at the time (Planning Policy Guidance - PPGs and Planning Policy Statements - PPSs). As such, the Core Strategy does not simply repeat national policy, but has interpreted this higher level policy and addresses issues that have been identified as being of local importance.

As explained above, following the publication of the NPPF full weight can continue to be given to the policies within the Worthing Core Strategy until March 2013. However, after that time, consideration will need to be given to local policies and their level of consistency with the NPPF. This document sets out this assessment.

PAS Assessment

To help in the consideration of local policy conformity the Planning Advisory Services (PAS) has published guidance for local authorities in the form of a ‘Compatibility Self-Assessment Checklist’. It allows Councils with an existing Core Strategy to look at those areas of the NPPF that are new or different to previous legislation. The checklist provides some advice on how to identify the potential implications arising from the results of the assessment and some guidance on how Councils could respond and effectively manage any changes in policy approach needed.

Worthing Borough Council has used this self-assessment checklist as a template to assess the extent to which the Worthing Core Strategy complies with the new or different legislation throughout the report.

To ensure that the Core Strategy Development Plan is robust and fit for purpose the Council must be satisfied that the overall policy approach is in broad conformity with the NPPF and if it isn’t, set out a work programme that demonstrates how this can be achieved. By carrying out this assessment, it will enable the Council to:

- Respond proactively and speedily to the NPPF
- Assess the Worthing Core Strategy against the NPPF
- Identify any gaps
- Understand and mitigate against the risks of having these gaps

The PAS guidelines have identified the main elements that the NPPF requires Local Plans to include, and highlight areas that are significantly different from previous national policy and guidance as set out in PPGs and PPSs. The checklists focuses on identifying where any gaps or incompatibilities might be and these may relate to
one, or a combination, of the following: individual policies; the presumption in favour of sustainable development; the NPPF as a whole.

**Planning Policy for Traveller Sites**

The PAS self-assessment includes a section specifically on Planning Policy for traveller sites. This is because the NPPF must also be read in conjunction with the CLG ‘Planning policy for traveller sites’ (March 2012) which replaced previous circulars.

Overall, the government’s aim in relation to planning for traveller sites is:

‘to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers which respecting the interests of the settled community’ (Planning policy for traveller sites (Para 3).

To achieve this, the government has instructed local planning authorities to work collaboratively to make their own assessment of need for the purposes of planning. Fair, realistic and inclusive polices should be included and these should help to provide (where appropriate) more private traveller sites which, in turn, will help to reduce the number of unauthorised developments.

The assessment reviews the current and future policy position for travellers against the requirements of the NPPF and ‘Planning policy for traveller sites’ (March 2012).

**Report Layout**

For each section of the NPPF the checklist that follows sets out the key comments and questions identified by the Planning Advisory Service. It identifies content in the NPPF that is new or significantly different from previous national policy and asks questions to help understand whether the Worthing Core Strategy includes what the NPPF expects.

The format of this report is in line with that of the PAS Compatibility Self-Assessment Checklist, so that it can easily be cross-referenced, along with the NPPF and Planning Policy for traveller sites guidance. It is divided into four main sections:

- Part 1 – Achieving Sustainable Development (NPPF)
- Part 2 – Delivering Sustainable Development (NPPF)
- Part 3 – Planning Policy for Traveller Sites
- Part 4 – Plan-Making (NPPF)

The checklist then sets out the Worthing Borough Council Policy Response in that it summarises how the Worthing Core Strategy and other supporting documents address the issue and meet the NPPF’s expectations. It explains how significant any differences are and then whether they affect the overall strategy.

By assessing the above points the overall level of risk is determined. This is summarised below:
Risk Level

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>LOW</td>
<td>Policies are in conformity with the NPPF and no further action is required and / or the differences are not applicable to Worthing.</td>
</tr>
<tr>
<td>MEDIUM</td>
<td>Policies are in general conformity with the NPPF and future work and / or guidance will be progressed to address any ‘gaps’.</td>
</tr>
<tr>
<td>HIGH</td>
<td>Policies are in conflict with the NPPF and immediate action is required – either through a partial or full review of the Core Strategy.</td>
</tr>
</tbody>
</table>

The level of ‘risk’ is identified throughout the report for each section of the NPPF, and where appropriate, if there are multiple policy issues within a particular section, the risk will be identified for each relevant section. A summary of risks can be found in Appendix 1 and where they contain two different risk levels, it reflects variation of conformity within a particular section.

Appendix 2 takes all those risks identified that are not green (i.e. not in direct conformity with the NPPF). It then summarises the steps the Council will take to mitigate those risks and the estimated time-scale for these works (i.e. whether work will be carried out in the short or medium term, or is on-going).

Appendix 3 sets out the contents, Strategic Objectives and Policies of the Worthing Core Strategy, along with the relevant page numbers, to help with cross-referencing.
Part 1 – Achieving Sustainable Development

The presumption in favour of sustainable development and core planning principles (para 6-17)

<table>
<thead>
<tr>
<th>What NPPF expects local plans to include to deliver its objectives</th>
<th>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</th>
</tr>
</thead>
<tbody>
<tr>
<td>Questions to help understand whether your local plan includes what NPPF expects</td>
<td>Does the plan positively seek opportunities to meet the development needs of the area?</td>
</tr>
<tr>
<td></td>
<td>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?</td>
</tr>
<tr>
<td></td>
<td>Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A model policy is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</td>
</tr>
</tbody>
</table>

Does your local plan address this issue and meet the NPPF’s expectations?

The Vision for Worthing, as set out in the Core Strategy, is that development will provide the impetus for regeneration to ensure that Worthing plays a leading role within the sub-region. To achieve this, the Strategy promotes the development of a number of key regeneration sites that will help to deliver the investment, homes and jobs required to meet the needs of the Borough during the plan period. These needs are based on, and informed by, local evidence.

To achieve these strategic aims the plan and its policies were written in a positive manner to support appropriate development. This reflects the general thrust of the NPPF and is in contrast to many policies included in ‘old style Local Plans’, which were often very restrictive and written negatively.

In drawing up the development strategy for Worthing very close attention was given to the way in which growth can perform an economic role, a social role and an environmental role. These elements are mutually dependent and the spatial strategy for Worthing takes these into account along with consideration towards the different roles and characters of places. As an example, the spatial strategy reflects the priority placed on regeneration and meeting the needs of the community with particular emphasis placed on seeking to address issues in wards with higher levels of deprivation and the town centre (reflecting the NPPF support for the town centre). Furthermore, the spatial strategy makes clear that, other than one exception, all development opportunities are on previously developed land and located in sustainable and accessible locations. Where appropriate, the natural, built and historic environment are protected. These overarching local objectives are very much in line with the three dimensions of sustainable development set out in the NPPF.

The Core Strategy provides a clear understanding of the current economic climate and provides some consistent and clear messages that seek to deliver proactive solutions. The desire to regenerate key areas of the town demonstrates that
Worthing is very much ‘open for business’ but this invitation (as the NPPF suggests) is balanced against the need to protect sensitive or threatened areas of the Borough.

**Flexibility**

The need for the Core Strategy to be flexible and able to react to change was a key consideration when the plan was drafted and was an issue that was given particular scrutiny by the Inspector at the Examination. The Core Strategy was prepared against a backdrop of economic recession (and legislative change). As a result, providing a robust implementation timetable that demonstrated a good degree of delivery certainty was difficult. In response to this, the document was been drafted to ensure that it is flexible enough to react to changes in market conditions, needs and legislation. Although it is not known how long the economic downturn will last (or the full impacts that the changes in the planning system will have) it can be assumed that, during the Core Strategy period, the market will again be operating under conditions that support growth. A key aim of the Core Strategy and subsequent documents is to help ensure that the framework is in place to respond to changing circumstances in a way that supports and facilitates required growth and desired regeneration. This is reflected in Core Strategy Chapters 9 (implementation) and 10 (monitoring), where it is explained how and when the delivery strategy may need to be amended to react to change.

**Model Policy**

The NPPF is clear in that Local Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will provide guidance as to how the presumption should be applied locally. Based in paragraph 15 of the NPPF, the Planning Inspectorate considers that a model policy will, if incorporated into a draft Local Plan submitted for examination, be an appropriate way of meeting this expectation.

As stated above, the Worthing Core Strategy is written positively and, in general, conforms to the over-arching principles set out in the NPPF. However, it does not contain the ‘model policy’ that collates these principles into one statement as the model policy did not exist at the time the Core Strategy was prepared.

**How significant are any differences? Do they affect your overall strategy?**

Although the Core Strategy does not include the model policy relating to the ‘presumption in favour of sustainable development’ it does conform with the general thrust of the NPPF in that it encourages and helps to facilitate sustainable growth in appropriate locations. It seeks to meet the development needs of the town (albeit balanced against capacity constraints), it is written positively and is sufficiently flexible to adapt to change when required.

**Objectively assessed need**

It should be acknowledged that the Core Strategy was advanced against the backdrop of the South East Plan (which set housing targets etc) rather than the NPPF and ‘localism agenda’ (which allows for local communities to consider levels of growth in relation to identified need). Working in partnership with neighbouring authorities during the preparation of the South East Plan helped to ensure that the levels of growth allocated to Worthing were appropriate given local constraints and sub-regional considerations. Despite this, the Council recognises that it needs to reassess its position in light of the NPPF / localism agenda. Work is being
undertaken on a sub-regional Strategic Housing Market Assessment (SHMA) update, which will help to provide a local housing needs assessment for Worthing. This updated evidence, along with continued working with neighbouring authorities, will influence if and when a review of the Worthing development strategy is required. Early indication is that it is unlikely to be the case at this time.

Model Policy

Although the Worthing Core Strategy is written positively and, in general, conforms to the over-arching principles set out in the NPPF it does not contain the ‘model policy’ – which would be included if the Plan was being advanced today. However, advice from the Planning Advisory Service is clear in that if the Development Plan has been adopted fairly recently, and if the Council is confident that it is broadly compatible with the NPPF, then there is no need to review the Plan just to include the model policy. It would simply need to be included during any subsequent review.

OVERALL RISK = MEDIUM

<table>
<thead>
<tr>
<th>What NPPF expects local plans to include to deliver its objectives</th>
<th>The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making)</th>
</tr>
</thead>
<tbody>
<tr>
<td>12 broad planning principles set out in the NPPF that should under-pin both plan-making and decision-taking are reflected throughout the Core Strategy. A brief summary of this conformity is set out for each element (a summary of the core-land use principles that planning should follow is outlined in bold) and any ‘gaps’ / weaknesses are addressed below.</td>
<td></td>
</tr>
</tbody>
</table>

1. Be genuinely plan-led. The Core Strategy seeks to provide a genuinely Plan-led framework for Worthing that will guide development, growth and investment in the Borough for the next 14 years. It was advanced in partnership with key stakeholders and in discussion and agreement with neighbouring authorities (see also Part 4 Plan-Making of the report).

2. Enhance and improve places where people live. Chapter 5 – The Spatial Strategy addresses the distribution of development and reflects the priority placed on regeneration and meeting the needs of the community – particular emphasis is placed on seeking to address issues within the town centre and wards with higher levels of deprivation.

3. Proactively drive and support sustainable economic development. The Core Strategy was objectively assessed against identified needs and the development strategy and associated policies reflects this. This relationship between need and delivery was one of the key tests at the public examination. Despite this, the relationship between ‘need’ and ‘delivery’ needs to be reassessed in light of changing guidance / legislation.
4. **Secure High Quality Design.** The objective of delivering high quality design is a recurring theme throughout the Core Strategy (particularly Policy 16, and Strategic Objective 6). The aim is that ‘good design’ will be indivisible from ‘good planning’ and that all new developments should function well and add to the overall quality of an area.

5. **Take account of different roles and character of different areas.** The spatial strategy is clear in that outside of the built up area boundary the emphasis is on the protection and enhancement of the natural environment (Strategic Objective 1 and Policy 13).

6. **Support the transition to a low carbon future.** Strategic Objective 1 seeks to address the impacts of climate change and policies 13, 15, 17 and 18 will help contribute to meeting these aims.

7. **Contribute to conserving and enhancing the natural environment; 8. Encourage effective use of land; 11. Promote sustainable transport.** The spatial strategy makes clear that other than the strategic development site at West Durrington (which was objectively assessed within the Sustainability Appraisal), all other development sites are previously developed and located in sustainable and accessible locations throughout the town. Areas of the borough with higher environmental value are protected. Policy 19 and the requirement for Transport Assessments to support large schemes will help to ensure that developments are accessible and that opportunities to incorporate sustainable modes of transport are maximized.

9. **Promotes mixed-use development and land-use.** The approach in the Core Strategy, particularly the Areas of Change, is to deliver a vibrant mix of uses. Policies 13 and 14 address countryside and open space issues.

10. **Conserve heritage assets in a manner appropriate to their significance.** Strategic Objective 6 provides a key outcome that Worthing’s built heritage and historic assets are conserved and, where possible, enhanced (See also policy 16).

12. **Improve health, social and cultural wellbeing.** The Core Strategy explains how the Sustainable Community Strategy was a key consideration as the Core Strategy was advanced. Health, social and well-being issues are highlighted within the ‘Issues and Challenges’ section. The development strategy then sets out ways in which these issues can be addressed.

**How significant are any differences? Do they affect your overall strategy?**

It is clear that all of the above core land-use principles established within the NPPF do under-pin the Worthing Core Strategy. However, for some elements it is considered that this conformity could be further enhanced in the following respects:

1. Although Worthing did co-operate with neighbouring authorities when considering larger than local level issues and preparing its Core Strategy it would be fair to say that this process was not audited or reported in the manner that is now expected by the requirements of the NPPF. For this reason, there is an even greater need for cross-boundary working and co-ordination to better align economic and housing growth and deliver infrastructure in a timely manner. Duty to Co-operate working groups have been established across different areas and tiers and it is important that these are aligned with local processes to help provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Consultants have been appointed to consider the SHMA
update within the context of sub-regional housing needs, development constraints and the Duty to Co-operate.

3. See comments relating to ‘objectively assessed need’ above.

4. Additional guidance to support and encourage high quality design will be progressed within Supplementary Planning Documents (SPDs) and technical notes (See ‘7. Requiring Good Design’ in Part 2 of this report for more details).

6. The principals established in the Core Strategy will be further enhanced through subsequent Local Development Documents which will help to reinforce local compliance with the NPPF. In particular, a Sustainable Design and Construction SPD, which is programmed within the Local Development Scheme (LDS), will help to raise awareness of the local impacts of climate change and give guidance on how to achieve high levels of sustainability in developments.

10. The need to protect and conserve heritage assets is addressed in several places in the Core Strategy, particularly, Policy 16 – Built Environment and Design. However, in response to the likely loss of the South East Plan and the removal of PPS5, some additional guidance at the local level would help to support and supplement the NPPF with regards to conserving and enhancing the historic environment. For this reason the LDS has highlighted the need to produce a Conservation and Heritage Technical Note / SPD for Worthing (see 12. Conserving and Enhancing the Historic Environment in Part 2 of this report for more details).

12. Linking the development strategy to the Sustainable Community Strategy (SCS) and the needs of the local community must be a continuous process that does not stop with the adoption of a plan. The strategy must be able to react to changing needs. For these reasons, evidence and strategies relating to health, social and well-being issues must continue to inform the delivery of the development strategy (and or any necessary revisions). Future work on the Community Infrastructure Levy (CIL) and Neighbourhood Planning will provide opportunities for these links at the local level to be established.

OVERALL RISK = MEDIUM
Part 2 – Delivering Sustainable Development

1. Building a strong, competitive economy (paras 18-22)

| What NPPF expects local plans to include to deliver its objectives | Set out a clear economic vision for the area which positively and proactively encourage sustainable economic growth (21). |
| Questions to help understand whether your local plan includes what NPPF expects | Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose)? para (22) |

Does your local plan address this issue and meet the NPPF’s expectations?

The very first lines of the Core Strategy Vision clearly refer to the delivery of a healthy and diverse population that will contribute fully to the economic growth and prosperity of the town by 2026. The Vision acknowledges that development will provide the impetus for regeneration to ensure that Worthing plays a leading role within the wider sub region. It goes on to state that the regeneration and delivery of ‘sites’ will deliver balanced and sustainable growth across the town. The final lines of the Core Strategy Vision recognise the NPPF’s aim of proactively meeting the development needs of business and support for an economy fit for the 21st Century.

Key to drawing up the most appropriate approach to the Worthing economy was gaining an understanding of how the local economy functions and what is required to maintain and improve its position. This included, amongst other matters, updating existing studies to reflect the prevailing conditions as the economy started to enter recession. A key study (Economic Research - Employment Land Knight Frank Oct 2009) considered both the existing and future needs of business in the town in terms of land requirements and the size, type and location of sites and premises needed.

Strategic Objective 3 states that the policy framework will promote and establish an environment that encourages and supports economic vitality. It refers to the need to identify development opportunities that maximise the potential for sustainable growth, which supports existing business and attracts new ones to the town (in line with Para.19 NPPF). In addition, the policies are written to help businesses plan, in that they give a degree of certainty and consistency, but are also flexible and pragmatic in their application.

Strategic Objectives 3 and 5 of the Core Strategy refer to the need to meet the development needs of businesses, including the delivery of a suitable educated and skilled workforce (in line with Para. 20 NPPF).

In respect of Para 21 of the NPPF, which refers to the key considerations that Local Planning Authorities should take into account when considering the needs of business, the following points are made:

- It is considered that the plan sets out a clear economic vision. This starts with the Vision and is followed through in the Strategic Objectives and Policies, as well as supporting documents such as the Infrastructure Delivery Plan and
the Sustainable Economy Supplementary Planning Document (SPD). There are a number of polices within the Core Strategy that will help deliver sustainable growth for Worthing, including economic policies themselves together with those for housing and infrastructure delivery. The Infrastructure Delivery Plan is a live document that seeks to identify the key infrastructure needs of the town and the mechanisms by which they can be delivered. This includes identifying potential barriers to investment such as poor environment and lack of infrastructure, services etc.

- Whilst there are no strategic sites identified for the delivery of specific floorspace for employment, the Core Strategy does identify Areas of Change. These are targeted areas for investment and change, which are considered to be the best opportunity to deliver the mix of development (including employment uses) needed for the town. This approach recognises both the reality that land within in the town is very constrained and that a flexible approach is needed both spatially and over time.

- Policy 3 seeks to ensure that the right conditions are in place to deliver a diverse and sustainable economy. This policy, together with Policy 4 and other polices that are directly linked to employment provision such as Policy 6 (Retail), have been written in a flexible way. This is to allow the Council to react rapidly to changes in economic circumstances if required.

- With regards to existing employment sites, their status has been reviewed and it has been considered whether there is a necessity to protect them in order to provide for a degree of certainty for businesses and to ensure there is a range of business floorspace on offer to meet business needs (current and future). Policy 4, together with the supporting Sustainable Economy SPD, recognises the need to protect the employment land and sites that we have in the town. It also acknowledges that changing economic circumstances and technological developments requires a flexible approach. As such, where there is a proposed loss of employment sites/premises, it will need to be demonstrated that the site is no longer viable for its current use and will not meet the business needs of other employment sectors before being lost to a non-employment use.

- Policy 3, amongst other matters, actively supports the investigation of a business incubator unit for the town. It is recognised that such a resource could perhaps be developed in association with an educational institution and/or a research and design facility to support and nurture sectors of the economy important to Worthing. This includes pharmaceuticals, advanced engineering and creative industries.

- Policies 3 and 4 refer to the identification of key employment areas for both protection and investment. It is recognised that these areas offer great potential to the local economy but could be used more effectively and deliver some of the additional floorspace required by businesses now and over the life time of the plan.

- Policy 3 specifically refers to the need to support the improvement of ICT infrastructure on sites, premises and also the support of home based business.
In response to Paragraph 22 of the NPPF, the plan does not specifically allocate sites for employment use. However, as outlined above, the approach is one which has identified key areas for investment and change through Areas of Change. However, there are key existing employment areas that have been afforded strong protection in Policy 4. This policy recognises the crucial role that these established employment areas play in the local economy. The approach recognises the constrained nature of Worthing and the business needs of the local economy over the plan period. Therefore, where those areas that have been identified as cornerstones of the local economy, (including industrial estates, business parks and key office locations), they have been afforded strong protection. Sites outside of these protected areas are dealt with in a more flexible way. Whilst the starting point is to protect, the Council will allow a change to other uses where it can be satisfactorily demonstrated that the site/premises is genuinely redundant and/or is unlikely to be re-used for an industrial or commercial use within the plan period.

In light of the above it is considered that the approach taken towards the building of a strong and competitive economy is consistent with those of the NPPF.

How significant are any differences? Do they affect your overall strategy?

It is considered that the principles set out within the NPPF in respect of the economy are fully reflected within the Core Strategy. However, that said, there is an area where further work would enhance conformity with national policy.

The underlying evidence base for the economic policies, whilst still relevant, may require updating in the near future. Whilst the existing evidence was updated prior to submission to consider the impact of the recession, the recession has continued and deepened. An updated survey would provide a clearer picture of the impact of the recession on the local economy and possibly reveal whether there has been any structural change in response to it.

Given the cross boundary nature of the economy and its clear links with other sectors in particular housing, it is considered that both a cross boundary and cross topic approach is required.

**OVERALL RISK =** LOW and MEDIUM
2. Ensuring the vitality of town centres (paras 23-27)

<table>
<thead>
<tr>
<th>What NPPF expects local plans to include to deliver its objectives</th>
<th>Set out policies for the management and growth of centres over the plan period (23).</th>
</tr>
</thead>
<tbody>
<tr>
<td>Questions to help understand whether your local plan includes what NPPF expects</td>
<td>Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?</td>
</tr>
</tbody>
</table>

Does your local plan address this issue and meet the NPPF’s expectations?

Various background studies were carried out to look at the need for town centre uses such as retail, employment, leisure and tourism opportunities. The needs and challenges of Worthing are identified below in the relevant sections of the Core Strategy, broken down by type of town centre use where appropriate. Proposals were then made to improve and expand the town centre to accommodate Worthing’s needs where appropriate as identified by the relevant Areas of Change and Polices.

As part of the Vision for Worthing Borough:

“The town centre and seafront will be a more accessible and thriving area that provides a vibrant mix of commercial, retail, residential, cultural and leisure activities” (4.2).

This statement from the vision sets out the range of town centre uses. The Core Strategy then identifies specific needs and opportunities for the various uses in order to achieve this vision. This section of the assessment has been divided into the following categories:

1. Retail
2. Leisure / Entertainment
3. Arts / Culture / Tourism
4. Commercial / Office
5. Residential / Housing

This issue is identified in the Core Strategy’s Strategic Objective 2, where key outcomes include improving the vitality and viability of the town centre, by increasing activity levels, improving economic performance and attracting higher visitor numbers. Furthermore, the Core Strategy considers the characteristics of the borough and in particular, its importance within the wider regional area. Strategic Objective 2 identifies the need for new, high quality retail and leisure spaces to create a more competitive town centre.

1. Retail

As identified in the Core Strategy’s ‘Characteristics of the Borough’ section, Worthing is the largest shopping centre of the coastal districts in West Sussex. The retail element of Worthing town centre is a major economic asset that could benefit greatly from its location. As a result, retail has been identified as an area of opportunity for
future growth in the ‘Issues and Challenges’ section. A key constraint for Worthing currently, is a lack of modern, flexible large units and is currently underachieving for the size of its catchment area. Therefore, as part of the Areas of Change identified in the Core Strategy, there are various retail proposals, which will enhance the retail opportunities of Worthing. The most significant of which is a new ‘retail core’ at Union Place South.

The Core Strategy’s Policy 6 – Retail goes into more detail and identifies the opportunity as a result of the development of these Areas of Change to extend the Primary Shopping Areas Zone A and Zone B in the creation of a new retail core, in order to attract national high quality retail operators to the town centre.

Various studies have been conducted prior to the submission of the Core Strategy to identify retail constraints and opportunities in Worthing Borough and have included the following:

- Coastal Districts Retail Study – DTZ (2005)
- Retail Study Update, DTZ (2010)
- Worthing Retail Core Development Brief, DTZ (2008)
- Supporting the retail sector study, GVA Grimley (2009)

2. Leisure / Entertainment

As identified in the Core Strategy’s ‘Characteristics of the Borough – Community Infrastructure’ (2.17), indoor leisure, recreation and community facilities play an important role in enhancing and maintaining people’s quality of life. The borough currently contains a variety of different types of facilities. However, the Core Strategy has acknowledged that the level of provision and quality of facilities varies significantly and a number of these are in need of enhancement, replacement and in some cases new provision.

Leisure has been identified as a sector likely to help drive forward the local economy over the next 5-10 years in the Core Strategy’s ‘Issues and Challenges – Regeneration and the Economy’ section (3.22).

The importance of leisure and entertainment facilities is reiterated throughout a variety of Policies and as part of proposals for Areas of Change promoting mixed-use development. The following Policies are relevant to leisure and entertainment:

- **Policy 3 – Providing for a diverse and sustainable economy.** Promotes the development of tourism, leisure, sporting and creative industries with a particular emphasis on the town centre and seafront locations.
- **Policy 5 – The Visitor Economy.** States that the Council will support new tourist and leisure facilities, also with a particular focus on the town centre and seafront.
- **Policy 6 – Retail.** Whilst focusing mainly on retail, it also encourages commercial, leisure and cultural mixed-use development.

Various studies have been conducted prior to the submission of the Core Strategy to identify leisure constraints and opportunities in Worthing Borough and have included the following:

- Worthing Evolution Town Centre & Seafront Masterplan (2006)
- Employment Land Review, Step Ahead (2005)
3. Arts / Culture / Tourism

As identified in the Core Strategy’s ‘Characteristics of the Borough’ section, tourism plays an important role in the town centre for Worthing owing to its seaside location. However, over the last 20 years there has been a decline in the ‘traditional’ tourist market. As a result, Worthing has been working towards adapting to these changes and is aiming to deliver a more varied and flexible tourism, cultural and leisure offer to meet new requirements.

An example of this is the publication of a ‘cultural heart’ document which aims to highlight Worthing’s cultural, historic and unique heritage. The Council has also continued to support events and attractions and is keen to further develop an events programme.

Despite a reduction in accommodation stock over the last 30 years as a result of the disappearance of the long holiday market the town retains a good supply of hotels and guesthouses which offer a variety of accommodation types and standards.

Tourism is identified as a sector likely to help drive forward the local economy over the next 5-10 years as stated in the Core Strategy’s ‘Issues and Challenges’ section. It also highlights the importance of creating linkages between the town centre and seafront, to enhance retail and tourism simultaneously. A key challenge for Worthing is to ensure the accommodation stock adapts to the needs of visitors through a combination of upgrading the quality of the existing stock and new provision.

The following Strategic Objectives and Policies are relevant to tourism, culture and arts:

- **Strategic Objective 3 – Deliver a Sustainable Economy.** States that the cultural and tourism offer will be upgraded, attracting more visitors to the town.
- **Policy 3 – Providing for a diverse and sustainable economy.** Aims to support the development of tourism, leisure, sporting and creative industries with a particular emphasis on the town centre and seafront locations.
- **Policy 5 – The Visitor Economy.** States that the Council will support new tourist and leisure facilities, with a particular focus on the town centre and seafront.
- **Policy 6 – Retail.** Whilst focusing mainly on retail, it also encourages commercial, leisure and cultural mixed-use development.

Various studies have been conducted prior to the submission of the Core Strategy to identify tourism, arts and cultural constraints and opportunities in Worthing Borough and have included the following:

- Coastal West Sussex Hotel and Visitor Accommodation Futures, Hotel Solutions (2008)

Furthermore, a Joint Arts and Cultural Strategy is currently being developed.

4. Commercial / Office

As identified in ‘Characteristics of the Borough’, Worthing has a significant service sector, led by large public sector employers and financial firms. Approximately 25%
of office floorspace is located within the existing town centre boundary and 15% is edge-of-centre. Demand in the office market is characterised by either long-established or indigenous firms seeking better quality space or expansion.

The Core Strategy recognises the need to improve economic performance and raise earnings and to secure sustainable economic regeneration in the ‘Issues and Challenges’ section. Particular challenges and opportunities include skills-led growth, innovation and creativity driven growth, economic upgrading, connectivity, culture and leisure based growth. Worthing also has the lowest level of new business growth in West Sussex, therefore it is important to raise the level of entrepreneurship.

As a result, there is a strong local demand for affordable and flexible business accommodation, especially to meet the needs of small businesses.

One of the overall objectives of Worthing Borough’s Vision is that:

“The town’s area of employment will support the development of a flexible mix of office and industrial units, which will stimulate employment growth.”

This will be achieved through the following Strategic Objectives and Policies, as well as identifying specific development proposals at Areas of Change:

- **Strategic Objective 3 – Deliver a sustainable economy.** New employment space will be provided through a combination of new sites, redevelopment / refurbishment of existing stock and as part of major mixed-use town centre schemes.
- **Policy 3 – Providing for a diverse and sustainable economy.** Promotes the delivery of new town centre office space through major new mixed-use schemes.
- **Policy 4 – Protecting Employment Opportunities.** Safeguards existing employment areas and key office locations.

Various studies have been conducted prior to the submission of the Core Strategy to identify commercial and office constraints and opportunities in Worthing Borough and have included the following:

- Employment Land Review, Step Ahead (2005)
- Small Business Units Feasibility Study (2006)
- Worthing Employment Sector Review, Knight Frank (2009)
- Five Town Network, CACI (2006)

5. Residential / Housing

As identified in the Core Strategy’s ‘Issues and Challenges’, Worthing is required to provide a range of market housing options that meets the needs of the whole community. There have been a number of family homes that have been lost through redevelopment and conversion in recent years and whilst the delivery of flats will be important over the coming years it should not be the principle type.

The Core Strategy will enable the delivery 200 homes per annum (4,000 in total) between 2006 and 2026. A significant proportion will be provided at a mixed-use strategic site at West Durrington, with the remainder being brought forward through identified sites and smaller scale developments within the borough’s built up area boundary.
The following Strategic Objectives and Policies are relevant to Worthing’s Housing and support the need for expansion in Worthing town centre:

- **Strategic Objective 4 – Meet Worthing’s Housing Needs.** A high quality strategic development (West Durrington) and supporting infrastructure will be completed to provide for a sustainable urban expansion that helps to meet identified housing need and contributes towards the regeneration of the surrounding area.

- **Policy 1 – West Durrington.** Residential dwellings (approximately 700) and a range of infrastructure, leisure, social and community facilities.

- **Policy 7 – Meeting Housing Need.** As identified above, the Core Strategy will facilitate the delivery of 4,000 net additional dwellings in the Borough in the period 2006-2026, at an annual rate of 200 dwellings per year.

- **Policy 8 – Getting the Right Mix of Homes.** The Core Strategy will deliver a wide choice of high quality homes to address the needs of the community.

- **Policy 9 – Existing Housing Stock.** The Core Strategy will seek to ensure the retention of housing stock unless reasonable justification can be given that doing so would improve the area as a whole.

- **Policy 10 – Affordable Housing.** A mix of affordable housing, including social rent and intermediate housing will be sought to meet local needs on all but the smallest sites.

Appropriate evidence used to support Core Strategy
Various studies have been conducted prior to the submission of the Core Strategy with regards to housing need and demand in Worthing Borough and have included the following:

- Empty Properties Strategy
- Worthing Housing Strategy (2005-2010)
- Financial Viability Affordable Housing, Adams Integra (2005)
- Study of economic viability of affordable housing options, Adams Integra (2007)
- Strategic Housing Land Availability Assessment, Worthing BC (2008)
- Coastal West Sussex Strategic Housing Market Assessment, GVA (2009)

**Areas of Change**

The following Areas of Change are those areas as identified in Policy 2 of the Core Strategy, which aim to improve and enhance Worthing’s town centre uses and include a variety of mixed-use development, such as retail, leisure, cultural, residential uses, which will promote the quality of life for residents and attract tourists to the area:

- **Area of Change 1 – Aquarena.** Delivery of a new public swimming pool and promote a vibrant mix of uses, including leisure.

- **Area of Change 2 – Marine Parade: Stagecoach Site.** Mixed development of retail, residential and cultural uses.

- **Area of Change 3 – Grafton Site.** Comprehensive mix of uses incorporating retail, leisure and residential

- **Area of Change 4 – Union Place South.** Provision of a new retail quarter, accommodating new modern retail floorspace and high density residential development, with supportive mixed-use development. The Connaught Theatre has also been included within the allocation to provide opportunities for enhanced leisure and entertainment opportunities.
• **Area of Change 5 – Teville Gate.** Significant new mixed-use redevelopment incorporating leisure, residential and supporting retail uses.

• **Area of Change 6 – Newland Street Superstore Site.** Comprehensive development to allow for modern convenience (food retail) floorspace. The site could also bring forward a high quality, modern office development scheme to provide an active commercial frontage on to Broadwater Road.

• **Area of Change 7 – British Gas Site – Lyndhurst Road.** Opportunity to bring forward a mixed residential scheme.

**How significant are any differences? Do they affect your overall strategy?**

The Core Strategy adequately covers new issues introduced by the NPPF. It has assessed the need to expand Worthing town centre, considering the needs of town centre uses including retail, leisure, entertainment, arts, culture, tourism, commercial, office and residential. This assessment has included using a variety of background documents and reports, which have helped to form the Strategic Objectives, Policies and identified Areas of Change where needs could be accommodated.

It can therefore be concluded that the Worthing Core Strategy is in direct conformity with the NPPF in this regard. There are no significant differences or conflict between them and therefore they do not impact on the overall strategy. However, it is recognised that be a need to update evidence documents in the future to ensure that future documents remain in conformity.

**OVERALL RISK = LOW**

<table>
<thead>
<tr>
<th>Ensuring the vitality of town centres (paras 23-27)</th>
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<tr>
<td><strong>What NPPF expects local plans to include to deliver its objectives</strong></td>
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</table>

The Core Strategy identifies existing primary and secondary shopping frontages. The Primary and Secondary Shopping Areas were identified though the GVA study ‘Supporting the Retail Sector in Worthing Town Centre 2009’. The Core Strategy section ‘Characteristics of the Borough’ section describes the existing primary retail area, secondary shopping areas, as well as shopping areas located around the town that collectively provide a retail hierarchy. These include district centres, neighbourhood centres and local parades.

The Core Strategy’s Policy 6 then defines and identifies the Primary and Secondary Shopping Areas and frontages. Primary Shopping Zones are divided into A and B where Primary Zone A protects A1 uses and Primary Zone B allows for a more
flexible approach to A3/A4 uses. Secondary zones are more flexible and encourage more varied retail, commercial, leisure and cultural development.

It is anticipated that the Primary Shopping Area may need to be amended in the future, as a result of the development of a new retail core at Union Place South and also due to retail opportunities at the Grafton Site. After expected development at these Area of Change sites have been carried out, a review of the retail frontages will be carried out and amendments will be made if necessary.

It is important to note that the GVA Grimley study ‘Supporting the Retail Sector in Worthing Town Centre’ recommended that no amendments should be made to the Primary and Secondary frontages until this development occurs. Similarly, a recent review of Montague Street, one of the main Primary Shopping Areas in Worthing and also an important Secondary Shopping Area has also drawn this conclusion. This was in light of several applications that promoted a change of use of the Primary Shopping Area Zone A to non-A1 use which would not be supported by either the NPPF or the Core Strategy Policy 6 – Retail.

Relevant background studies include:
- Coastal Districts Retail Study – DTZ (2005)
- Retail Study Update, DTZ (2010)
- Worthing Retail Core Development Brief, DTZ (2008)
- Supporting the retail sector study, GVA Grimley (2009)

Saved Policies

The following Saved Policies have been retained from the Worthing Local Plan (2003), which are relevant to retail town centre uses and the shopping hierarchy for Worthing borough, as identified in Policy 6 – Retail. They provide further detail about Primary and Secondary Shopping Areas, as well as help to ensure the vitality of smaller retail areas, including local shopping parades and district centres (core and non-core).

S8 – Ground Floor Uses, Zone B, Primary Area, Central Shopping Area

This policy seeks to protect A1 uses, and identifies where exceptions may be acceptable. This reinforces Policy 6 – Retail which is in conformity with the NPPF to improve the vitality of town centres and by identifying appropriate Primary and Secondary Shopping Area frontages.

S10 – Ground Floor Uses, Secondary Area, Central Shopping Area

This policy seeks to retain the function of a Secondary Shopping Area, where permission will normally be granted for the change of use from A1 to A2 or A3, allowing for a more flexible approach.

S11 – Ground Floor Uses, Core Areas, District and Neighbourhood Centres

Seeks to maintain at least a 65% threshold of A1 units but also allows A2 and A3 uses. This is in line with protecting and enhancing town (and ‘local’) centres and ensuring their vitality, as stated in the NPPF.

S12 – Ground Floor uses in non-core areas district and neighbourhood centres
Outside the defined retail core, changes of use will only be allowed if it is an A1, A2, or A3 use. Again, this is to protect the retail function of the area, whilst allowing a more flexible approach in this instance owing to it being outside the retail core.

S13 – Ground floor uses local shopping parades

This policy seeks to protect local shopping parades, which have a special place in the shopping hierarchy, owing to their important role for the local community. Change of use from retail to other uses will not normally be permitted unless it is clear that a good range of shopping facilities will remain.

How significant are any differences? Do they affect your overall strategy?

The Worthing Core Strategy has identified Primary and Secondary Shopping frontages in Policy 6 – Retail, which are up to date and will be reviewed when future development is carried out. It is anticipated that a Retail SPD (or DPD if boundaries are being amended) will be produced in the future to accommodate this update.

The Saved Policies outlined above seek to retain and promote the vitality of the town centre and smaller centres. Therefore, they are in conformity with the NPPF and can continue to help inform planning decisions in the future (or until a subsequent review has been undertaken).

Overall, it can be concluded that the Worthing Core Strategy is currently in direct conformity with the NPPF. There are no significant differences or conflict between them and therefore they do not impact on the overall strategy. However, as stated above there may be evidence documents that need to be updated in the future to ensure that future documents remain in conformity. There may also need to be a future Retail SPD produced to update Primary and Secondary Shopping Areas and to consider the continued use of Saved Policies, when future development has been carried out.

OVERALL RISK = MEDIUM
### 3. Supporting a prosperous rural economy (para 28)

<table>
<thead>
<tr>
<th>What NPPF expects local plans to include to deliver its objectives</th>
<th>Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).</th>
</tr>
</thead>
<tbody>
<tr>
<td>Questions to help understand whether your local plan includes what NPPF expects</td>
<td>Do your policies align with the objectives of para 28?</td>
</tr>
</tbody>
</table>

Does your local plan address this issue and meet the NPPF’s expectations?

As identified under the Characteristics of the Borough section of the Core Strategy, Worthing is a unique place. Although the borough is predominantly urban in character, its location between the Sussex Downs to the north and the English Channel to the south provides is distinctiveness. Worthing’s countryside is of particular importance and quality. Most of the land outside the built up area to the north falls within the South Downs National Park. Worthing does not contain any rural settlements.

How significant are any differences? Do they affect your overall strategy?

The South Downs National Park Authority is the planning authority for the areas of Worthing designated as National Park. Given this, and the fact that there are no rural settlements in Worthing it is considered that this element is not of relevance to Worthing and as such, there is no impact on the overall strategy.

**OVERALL RISK = LOW**
4. Promoting sustainable transport (paras 29-41)

| What NPPF expects local plans to include to deliver its objectives | Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29). Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29). |
| Questions to help understand whether your local plan includes what NPPF expects | If local (car parking) standards have been prepared, are they justified and necessary? (39) (The cancellation of PPG13 removes the maximum standards for major non-residential development set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude LPAs from doing so if justified by local circumstances). Has it taken into account how this relates to other policies set out elsewhere in the Framework, particularly in rural areas? (34). Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure? |

Does your local plan address this issue and meet the NPPF’s expectations?

The Core Strategy (CS) acknowledges that Worthing has a slightly higher rate of car ownership than the national average and that, like most urban environments, it is characterised by areas of heavy road congestion, especially during the morning and evening peaks. It recognises that congestion and unreliable journey times have a negative impact on air quality and hinder inward investment and growth. A key challenge therefore, and perhaps the most challenging spatial issue that needs to be addressed, is ensuring accessibility to services and determining the best pattern of transport provision.

The borough is not the designated highways authority for the town. West Sussex County Council (WSCC) has responsibility for the provision and maintenance of most of the town’s local transport infrastructure. The Highways Agency is responsible for the A27 and some of the A24 - the primary through routes for Worthing. As such, another key challenge is to instigate and develop continuous and effective partnership working with these key stakeholders and public transport providers to tackle road congestion.

WSCC has, in conjunction with Worthing and other local authorities produced the West Sussex Local Transport Plan. This plan reinforces the strategic objectives of the Core Strategy and sets clear aims for transport over a 10-year period. These are to improve accessibility, reduce congestion, improve safety and reduce pollution.
Prior to the Examination of the Core Strategy the local transport priorities for the County Council and the Borough were agreed and a Statement of Common Ground (SCG) has been formulated which sets out where transport investment is likely to be most needed. It covers accessibility at key strategic locations, improving safety, car parking, demand management initiatives and bus service improvements. It recognises that the integration of transport policy with land use planning will help to influence travel behaviours to produce a more sustainable, healthier and efficient travelling environment.

Strategic Objective 7 – Improve Accessibility seeks to ensure that the policies of the Core Strategy deliver a sustainable transport network that is integrated with new development and promotes a modal shift towards more sustainable transport methods. The development strategy places a significant emphasis upon the town centre and other accessible locations in accommodating new, often mixed-use development and it is considered this will help to reduce the need to travel by car. It also recognises the need for improvements to air quality and the need to accommodate an increase in walking and cycling, which will play a part in improving the health of the town’s residents.

Policy 19 – Sustainable Travel commits the Council to working closely with its transport partners to produce a consistent and integrated approach to spatial planning and transport strategies. It seeks to increase the diversity of modes of travel by supporting continued improvements to public transport, improving walking and cycling provision and producing a car parking strategy that seeks to meet the needs of the economy, but also promote choice and deliver a safer, more accessible, more sustainable and healthy environment. In considering applications for new development, account will be taken of the demand that users will have for local public transport services and the impacts of car users on the surrounding areas. In addition, major new development will be expected to provide a Transport Assessment, which will specify how it will affect the surrounding areas and how it can mitigate against any adverse effects.

How significant are any differences? Do they affect your overall strategy?

It is considered that the policy approach to sustainable transport is consistent with those set out within the NPPF.

OVERALL RISK = LOW
5. Supporting high quality communications infrastructure (paras 42-46)

| What NPPF expects local plans to include to deliver its objectives | There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF. |

How significant are any differences? Do they affect the overall strategy?

The Core Strategy Vision seeks to deliver infrastructure in line with the requirements of Worthing’s population. In addition, Strategic Objective 3 includes a key outcome that ICT infrastructure is improved and Worthing is at the forefront in the delivery of technology to meet the needs of all residents and businesses. Policy 3 also supports the improvement of ICT infrastructure.

How significant are any differences? Do they affect your overall strategy?

There have been no different / new requirements set out in the NPPF. It is considered that the supporting principles already established in the Core Strategy along with the relatively detailed (criteria based) policy approach set out in the NPPF mean, that there is adequate policy coverage to determine applications for high quality communications infrastructure. As such, there is no current need to review this element.

OVERALL RISK = LOW
6. Delivering a wide choice of high quality homes (paras 47-55)

| What NPPF expects local plans to include to deliver its objectives | Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47). |
| Questions to help understand whether your local plan includes what NPPF expects | What is your record of housing delivery? Have you identified: a) five years or more supply of specific deliverable sites; b) an additional buffer of 5% (moved forward from later in the plan period), or c) If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47]. Does this element of housing supply include windfall sites; if so, to what extent is there ‘compelling evidence’ to justify their inclusion (48)? |

Does your local plan address this issue and meet the NPPF’s expectations?

Worthing has a very good record of housing delivery in relation to its housing requirement (200 dwellings per year - South East Plan allocation). The average net annual delivery rate over this period is 255 dwellings which exceeds the requirement by 27%.

The housing trajectory and housing land supply assessment set out in the Annual Monitoring Report (AMR) indicates that the Council has a healthy supply of deliverable housing sites for the next 5 years and 10 year periods.

Although there were very few comments made about the Council’s housing land supply assumptions at the Core Strategy Examination, the issue, and the associated housing trajectory, was scrutinized closely by the Inspector. In conclusion, the housing trajectory and the Council’s assumptions were considered to be reasonable and reliable. A continuous supply of housing will be delivered over the Core Strategy period to help meet identified needs and future housing completions will be monitored and reviewed annually in the AMR.

As explained, delivery rates for new housing have consistently exceeded the annual requirements. In addition, the Council’s housing land supply assumptions (and housing trajectory) show an over supply of housing sites beyond the 5% additional buffer suggested in the NPPF. In fact, the ‘over supply’ identified in the AMR for the next 5 years is approximately 100% - this reflects the expectation that the West Durrington strategic allocation and other sites such as Teville Gate come ‘on stream’ in this period.

In line with previous guidance, the Council’s housing land supply assumptions for the next 10 years do not include any allowance for windfalls. The Core Strategy is based on a quantum supply that gives certainty as opposed to windfalls which cannot be planned for or influenced.
Whilst the Core Strategy makes no allowance for windfall sites, these will continue to contribute to the overall housing land supply once completed. There is no policy in the plan which places undue constraints on small sites and therefore the Council expects the supply of small sites to continue. However, there is no compelling evidence to justify why they should be included within housing land supply assumptions at this time.

Given the above, it is clear that the Council’s approach to housing delivery meets the expectations of the NPPF. There is no evidence to demonstrate any previous significant under-delivery and the trajectory / delivery assumptions illustrate how this is set to continue.

**How significant are any differences? Do they affect your overall strategy?**

As summarised, the Council currently meets the main requirements of the NPPF in regards to the provision of housing land. However, it is important to note that the number of new homes to be provided is based on the requirements as set out in the South East Plan (SEP). These figures were based on West Sussex County Council’s work with input on local circumstances from the Districts / Boroughs for the draft SEP.

The SEP figure for Worthing of 4,000 dwellings was the original ‘Option 1’ figure and this figure remained constant throughout its preparation. The Option 1 figure was identified following public consultation and testing as being the appropriate level for the Borough to help achieve and contribute towards the vision for the Sussex Coast Sub-Region, meet local needs and help deliver the county-wide provision figure previously set by SEERA.

The Coastal West Sussex Strategic Housing Market Assessment (SHMA) concluded that ‘the South East Plan sets out a robust and sustainable strategy for the future regeneration, development and growth of the West Sussex sub-region’.

The housing targets for Worthing in the South East Plan were principally designed to meet locally generated needs rather than wider sub-regional needs. This is largely as a result of capacity constraints but also the emphasis placed on regeneration and the economy for the coastal district including Worthing.

Despite the expected revocation of the Regional Spatial Strategy (RSS) and the loss of the 4,000 dwelling target, this level of housing growth is still considered to be appropriate for the borough over the plan period. It was supported by local evidence through a combination / balance of five key factors: economic drivers; the need for affordable housing; the requirement to deliver different housing and types; the capacity to deliver new housing; and demographic drivers. In addition, it was a figure that was not contested during the Core Strategy Examination.

As outlined above, the Core Strategy was objectively assessed against identified needs and the development strategy and associated housing policies reflect this. This relationship between need and delivery was one of the key tests at the public examination.

However, it is recognised that the Examination was considered against the back-drop of the South East Plan (which set housing targets etc) rather than the NPPF and ‘Localism agenda’ (which allows for local communities to consider levels of growth in relation to identified need). For the reasons stated above, the Council is still satisfied
that the appropriate balance has been struck, however, the Council now needs to reassess its position in light of the NPPF / localism agenda.

Work is being undertaken on a sub-regional SHMA update which will help to provide a local housing needs assessment for Worthing. A subsequent study to review these findings against the needs of the sub-region will then be commissioned. This updated evidence, along with continued working with neighbouring authorities, will influence if, and when, a review of the Worthing development strategy is required. Early indication is that, in this regard, this is unlikely to be the case at this time.

**OVERALL RISK = MEDIUM**

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<tr>
<td>What NPPF expects local plans to include to deliver its objectives</td>
<td>Illustrate the expected rate of housing delivery through a trajectory and set out a housing implementation strategy describing how a five year supply will be maintained (47).</td>
</tr>
<tr>
<td>Questions to help understand whether your local plan includes what NPPF expects</td>
<td>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</td>
</tr>
</tbody>
</table>

**Does your local plan address this issue and meet the NPPF’s expectations?**

The removal of the national and regional brownfield targets (60%) for housing delivery will have no impact on housing land supply in Worthing. Other than the strategic site at West Durrington the development strategy is to deliver regeneration and development on Previously Developed sites. Given this, and the principally urban character of the Borough the proportion of development on Previously Developed sites is always going to be high.

**How significant are any differences? Do they affect your overall strategy?**

The Annual Monitoring Report (AMR) will continue to be used to set out the housing delivery rates from previous years and to illustrate the housing trajectory. A housing implementation strategy that provides commentary on the approach being taken (along with an assessment and any need for variation) will also be included.

The NPPF (para 47) suggests that the Council should set out its own approach to housing density that reflects local circumstances. The Core Strategy already does this. For example, it suggests the areas of the town that are more suited to higher densities and promotes other sites for lower density family housing. However, this approach is at a fairly high level and consideration is now being given to whether a more detailed review that informs local guidance should be included within the Council’s emerging Housing Design SPD.

**OVERALL RISK = MEDIUM**
Delivering a wide choice of high quality homes (paras 47-55)

| What NPPF expects local plans to include to deliver its objectives | Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159) |
| Questions to help understand whether your local plan includes what NPPF expects | Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs? |

Does your local plan address this issue and meet the NPPF's expectations?

Strategic Objective 4 of the Core Strategy aims to meet Worthing’s housing need. The aim is to deliver a balanced housing stock in terms of type, size and tenure that helps to meet the needs of all sectors of the community. To achieve this, the Core Strategy seeks to provide the right mix of homes which, in summary, focuses on the retention and delivery of family homes, housing to serve younger and older age groups and a commitment that all new homes should be adaptable to changing life circumstances.

The approach outlined above, and clarified within the housing policies, was inform by a Strategic Housing Market Assessment (SHMA), which considered demographic trends, household projections, housing and demand / supply across tenures.

The Core Strategy includes Policy 10, which states that affordable housing is required either on-site or through commuted sums on sites of 6+ dwellings. This approach was informed by national and regional policy and local evidence (SHMA and a viability assessment), which demonstrated an acute need for affordable housing in the borough. The requirements set out in the policy, whilst helping to meet this need, are realistic and achievable and are flexible and responsive to changing market conditions.

How significant are any differences? Do they affect your overall strategy?

The housing policies in the Core Strategy reflect the NPPF in that they plan for a mix of housing based on local evidence relating to demographics, needs and market trends. Furthermore, Policy 10 helps to address the need for all types of housing in Worthing with requirements for affordable housing provision.

The evidence to inform the approach outlined above was published to support the Submission of the Core Strategy. Although the Core Strategy was adopted relatively recently (April 2011) it is vital that the evidence to support the housing approach taken by the Council continues to be founded on up-to-date objectively assessed needs. For this reason, the Council commissioned a SHMA update in 2012 along with neighbouring authorities in the sub-region. The work will establish a strategic vision of housing supply and demand in all housing sectors up to 2028 and provide Worthing with a better understanding of the dynamics of the housing markets operating in and around Coastal West Sussex. This work, along with other updates (e.g. SHLAA) and duty to co-operate considerations may necessitate the need to
review the Council’s housing policy approach (however early indication is that this is unlikely).

The removal of the national minimum thresholds (15 units) for affordable housing was intended to allow local Councils to set their own thresholds that were most suited to their own areas. This change does not impact of the Worthing policy. The levels set within Policy 10 are informed by local evidence and respond to the needs of the town. Meeting housing need is a key objective but the thresholds for Worthing are set at a level that is realistic and deliverable.

**OVERALL RISK = MEDIUM**

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</table>

Does your local plan address this issue and meet the NPPF’s expectations?

This requirement is of very little relevance to Worthing which is principally urban in character and contains no rural settlements. A rural exceptions policy is not appropriate for Worthing as guidance indicates that this approach should be used specifically for affordable housing in small rural settlements.

How significant are any differences? Do they affect your overall strategy?

No impact on overall strategy.

**OVERALL RISK = LOW**

<table>
<thead>
<tr>
<th>Delivering a wide choice of high quality homes (paras 47-55)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Questions to help understand whether your local plan includes what NPPF expects</strong></td>
</tr>
</tbody>
</table>

Does your local plan address this issue and meet the NPPF’s expectations?

The Council has, for some time, been considering the issue of development in residential gardens. Concern has been raised previously that some inappropriate developments had been permitted, particularly in certain areas of the town.
The removal of garden land from the definition of previously developed land in 2010 allowed the Council to take a more rigorous approach to the appraisal of applications for new development in residential gardens. As such, a more appropriate balance has been struck which allows for well-designed, accessible and sustainable development to be permitted and at the same time allowing for inappropriate proposals to be refused.

Although there is no explicit reference to backland development in the Core Strategy, the need to ensure good design is a repeated message (in line with the NPPF). Core Strategy Policy 16 and its supporting text place great emphasis on design standards whilst at the same time respecting local patterns of development.

**How significant are any differences? Do they affect your overall strategy?**

The need to ensure good design is embedded in the Core Strategy. Good design includes a whole array of elements. Form, height, massing, scale, proportions, siting, layout and density are deemed the most important design criteria to be used when assessing all new developments (including garden development).

Given the changes made to how garden land is defined, and concerns that have been expressed in Worthing in recent years, these design criteria would be applied particularly rigorously for any ‘backland’ applications.

In addition, the Council’s new Housing Design Guide SPD will address this issue in more detail and will provide some additional criteria at the local level against which proposals can be assessed.

In addition, the Green Infrastructure SPD to be progressed in the medium term will consider all ‘green’ spaces and their function (bio-diversity, amenity etc). This assessment will include larger gardens and it will be used to help determine relevant applications.

**OVERALL RISK = MEDIUM**

<table>
<thead>
<tr>
<th>Delivering a wide choice of high quality homes (paras 47-55)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What NPPF expects local plans to include to deliver its objectives</strong></td>
</tr>
<tr>
<td><strong>Questions to help understand whether your local plan includes what NPPF expects</strong></td>
</tr>
</tbody>
</table>

**Does your local plan address this issue and meet the NPPF’s expectations?**

This requirement is of very little relevance to Worthing which is principally urban in character and contains no rural settlements.

**How significant are any differences? Do they affect your overall strategy?**

No impact on overall strategy.

**OVERALL RISK = LOW**
7. Requiring good design (paras 56-68)

| What NPPF expects local plans to include to deliver its objectives | There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF. |

Does your local plan address this issue and meet the NPPF’s expectations?

Worthing’s Core Strategy’s Vision states:

“New developments will be of a high quality and continue to be guided by the principles of sustainable development.”

This is in line with the NPPF, which highlights the importance of good design in contributing positively to making places better for people. The NPPF goes on to say that local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.

NPPF states that policies should aim to ensure that development:
- Add to the overall quality of the area
- Establish a strong sense of place
- Sustain an appropriate mix of uses
- Respond to local character and history, but at the same time allows for innovation
- Creates safe and accessible environments
- Are visually attractive through good architecture and appropriate landscaping

In summary, the core element of the NPPF is that new development should be of a high quality and appropriate to the local context and that existing high quality development should be protected and where possible enhanced. Development includes not just individual buildings, but also public and private spaces, and the public realm.

There are no new requirements or significantly different policy content requirements as a result of the new NPPF. As such, it is considered that the Worthing Core Strategy is very much in line with NPPF policies. The following Strategic Objective and Policy are of particular relevance, when considering the need for good design:

**Strategic Objective 6 – Deliver High Quality Distinctive Places**

- New development is built in sustainable locations, to a high standard that enhances the environment whilst also respective of the character of the borough.
- Many parts of the borough already have distinctive characteristics. These areas add to the local identity and contribute towards the character and quality of life of the surrounding areas. As such, they need to be retained and where possible, enhanced.

**Policy 16 – Built Environment and Design**

- New development will be expected to demonstrate good quality architectural and landscape design and use of materials that take account of local physical, historical and environmental characteristics of the area.
• Development should display a good quality of architectural composition and detailing as well as respond positively to the important aspects of local character, exploiting all reasonable opportunities for enhancement.
• Where appropriate, innovative and contemporary design solutions will be encouraged.

The above Strategic Objective and Policy in the Core Strategy have been written in line with previous national legislation, as well as a result of background studies carried out prior to the submission of the Core Strategy. These have looked at a local context of good design for Worthing and opportunities to enhance the character of the area.

Relevant background documents include:
• Worthing Evolution Town Centre and Seafront Masterplan (2006)
• West Sussex County Council’s Historic Environment Record
• The Worthing Local Interest Study (2003)
• Listed Buildings Register
• Conservation Area Appraisals

There are no new or significantly different requirements for the policy context of requiring good design. As a result, the Core Strategy is in line with the NPPF as it was with regards to previous policies used. However, at the time of writing the Core Strategy, it was intended that future documents be produced as Supplementary Planning Documents (SPDs), which will go into further detail with regards to design principles. Various SPDs are currently being produced or will be produced in the future and these will be in line with both NPPF and Worthing Core Strategy policies: In particular the NPPF states that: ‘design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally’ (para 59). This will be incorporated into the following SPDs / Guidance:

1. **Tall Building Strategy** - currently being produced to help progress design standards with regards to tall buildings owing to the fact that their impact on the local surrounding, by their very nature is more profound. This document will ensure that any proposals for higher buildings are properly considered in the context of a clear long term vision.

2. **Housing Design Guide** - using supporting evidence, the SPD will help to further clarify Core Strategy policy objectives (e.g. on issues such as family housing, residential densities and conversions). The SPD also provides an opportunity to sets out a more detailed approach for the design of new development in the borough; its buildings, public and private spaces. It can provide guidance on how the location, form and type of all new development in Worthing should be considered through the design process to help achieve a high quality, distinctive, safe and sustainable built and natural environment.

3. **Conservation and Heritage** – this document will merge all available information relating to conservation and heritage issues in Worthing. It will also provide advice as to how such issues will be considered in light of Core Strategy policies. The document will cover conservation areas, conservation appraisals and timetable for future appraisals that will be undertaken,
conservation area management plans, listed buildings, locally listed buildings, historic parks, scheduled monuments and archaeology.

Saved Policies

The following Saved Policies have been considered in relation to the NPPF:

- **BE25 – Environment Areas of Special Conservation** – states that all development within an Environmental Area of Special Character will be required to reflect the particular character of the area concerned. Development which would adversely affect the existing features that contribute to its character would not be permitted.

- **CT3 – Protection and Enhancement of Seafront Area** – states that development will be permitted as long as it respects and where possible, enhances the appearance and character of the seafront and has regard to existing sea views. It also needs to ensure that it is appropriate to its location in terms of density, scale, height, massing, appearance, orientation, layout and siting, both in itself and in relation to adjoining buildings, spaces and views to the sea.

Both Saved Policies BE25 and CT3 are in line with NPPF’s objectives that new development should be of a high quality and appropriate to the local context and that existing high quality development should be protected and where possible enhanced. As a result, these Saved Policies are in conformity with the NPPF.

- **H16 - Domestic Extensions and Alterations** - provides guidance as to when extensions and alterations to dwellings and ancillary development would be permitted. Generally, it states the need for appropriate scale, design, materials and site coverage in order to be acceptable, and should not adversely affect the street-scene by occupying space between buildings that should be kept open.

Saved policy H16 is in conformity with the NPPF, as it helps to ensure that extensions do not have adverse impacts on the design quality of an area. Furthermore, as identified in the Local Development Scheme, it is anticipated that a Domestic Extension Technical Note will be produced in the future, which will include further guidance with regards to domestic extensions. This technical guidance will also be in line with the NPPF.

**How significant are any differences? Do they affect your overall strategy?**

There are no new or significantly different requirements for the policy context of requiring good design. As a result, the Core Strategy remains in line with regards to previous policies and is therefore in conformity with the NPPF.

However, it is important to note that at the time of writing the Core Strategy it was intended that future documents be produced at the local level which will go into further detail with regards to design principles. These SPDs and Technical Notes will be more detailed, technical guidance than the Core Strategy currently provides. It is anticipated that once these documents are adopted, that they will comprehensively cover all the policy requirements of good design for Worthing.

**OVERALL RISK = MEDIUM**
<table>
<thead>
<tr>
<th>8. Promoting healthy communities (paras 69-78)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What NPPF expects local plans to include to deliver its objectives</strong></td>
</tr>
<tr>
<td>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</td>
</tr>
<tr>
<td><strong>Questions to help understand whether your local plan includes what NPPF expects</strong></td>
</tr>
<tr>
<td>Does the plan include a policy or policies addressing community facilities and local services?</td>
</tr>
<tr>
<td>To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</td>
</tr>
</tbody>
</table>

**Does your local plan address this issue and meet the NPPF’s expectations?**

The planning system seeks to ensure that community responsive policy-making is at its heart. The Core Strategy is critical in achieving this as it will help to deliver both corporate and community aspirations. For this reason, the key spatial planning objectives are linked to the Corporate Plan and closely aligned with local priorities identified in the Council’s Sustainable Community Strategy (SCS). The SCS considers and decides how to address issues such as the economic future of the area, environmental protection and social exclusion. Building these factors into the Core Strategy is at the heart of creating sustainable development at the local level.

The Core Strategy seeks to ensure that existing facilities which support the borough’s overall community infrastructure are protected and, where needed, positive improvements are achieved. This is based on evidence of existing facilities and likely future requirements. Policy 11 is the main mechanism through which this will be achieved. It is particularly important that this policy is applied in Worthing given that developable land within the borough is relatively limited. As a result there is often pressure to release community facilities to other uses.

As a starting position the policy restricts the loss of community facilities but provides a set of criteria through which alternative uses may be considered. It also highlights how, in appropriate circumstances the dual use of community facilities will be encouraged.

**How significant are any differences? Do they affect your overall strategy?**

The Core Strategy, and particularly policies 11, 12 and 14, are very much in line with the expectations of the NPPF. Given the physical constraints around Worthing and the existing level of provision it is vital that these principles are firmly embedded in the local planning framework. Shared facilities are supported at the local level but this encouragement could perhaps be enhanced within subsequent and appropriate Supplementary Planning Documents (SPDs) and Development Briefs.

A key objective will be to ensure that the needs of the community are actively planned for and met as developments identified within the Core Strategy come...
forward in the coming years. This must be informed through working with the local
communities (potentially through Neighbourhood Plans) and service providers (e.g.
WSCC) to ensure that needs are identified and delivered as a fundamental element
of any growth.

Further evidence base work such as the proposed Green Infrastructure Strategy SPD
and a soon to be commissioned open space study will also help to inform future
infrastructure requirements.

Much of this work will be encapsulated within the Council’s emerging Community
Infrastructure Levy which will help to identify and co-ordinate infrastructure needs.
Working with key partners and stakeholders will also help to prioritise delivery
programmes. CIL will also provide a mechanism through which the local community
will be able to determine how a significant proportion of the money collected will be
spent.

OVERALL RISK = LOW

<table>
<thead>
<tr>
<th>Promoting healthy communities (paras 69-78)</th>
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<tbody>
<tr>
<td><strong>What NPPF expects local plans to include</strong></td>
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<tr>
<td>to deliver its objectives</td>
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<tr>
<td>Enable local communities, through local and</td>
</tr>
<tr>
<td>neighbourhood plans, to identify special protection green</td>
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<tr>
<td>areas of particular importance to them – ‘Local Green</td>
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<tr>
<td>Space’ (76-78).</td>
</tr>
<tr>
<td><strong>Questions to help understand whether</strong></td>
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<tr>
<td>your local plan includes what NPPF <strong>expects</strong></td>
</tr>
<tr>
<td>Do you have a policy which would enable the protection of</td>
</tr>
<tr>
<td>Local Green Spaces and manage any development within</td>
</tr>
<tr>
<td>it in a manner consistent with policy for Green Belts?</td>
</tr>
<tr>
<td>(Local Green Spaces should only be designated when a</td>
</tr>
<tr>
<td>plan is prepared or reviewed, and be capable of enduring</td>
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<tr>
<td>beyond the end of the plan period. The designation</td>
</tr>
<tr>
<td>should only be used when it accords with the criteria in</td>
</tr>
<tr>
<td>para 77).</td>
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</table>

**Does your local plan address this issue and meet the NPPF’s expectations?**

To ensure a high quality of life for all, the Core Strategy places great emphasis on
the protection and enhancement of environmental assets, including green spaces |
(Strategic Objective 1). Policies 13 (Natural Environment and Landscape Character) |
and 14 (Green Infrastructure) are particularly relevant as they provide the local policy |
framework for the protection and enhancement of green spaces in and around the |
town. Given the character of the town and development constraints / pressures the |
policies place great emphasis on protection. As such, spaces that are valued by a |
local community are unlikely to be vulnerable to development despite them not |
having any formal ‘Local Green Space’ designation.

This framework will be further supported by subsequent evidence work (open space / |
playing pitch review) and the progression of the Green Infrastructure Strategy SPD.

**How significant are any differences? Do they affect your overall strategy?**

There is currently no explicit reference to Local Green Spaces as this particular |
designation is new within the NPPF. There is no opportunity to ‘retrofit’ provisions for |
Local Green Space designation within the Core Strategy or address fully within
emerging SPDs and local guidance notes as the NPPF is clear in that these areas can only be designated when a plan is prepared or reviewed.

However, the need to retain and enhance existing valued green spaces is very much embedded in the Core Strategy and is expected to be further detailed within a subsequent Green Infrastructure Strategy SPD. This document will be in line with the NPPF. As such, there is not considered to be a pressing need to address the issue of Local Green Spaces in Worthing and this issue alone, would not be reason enough to trigger a review of the Development Plan. However, this issue will be considered fully in any subsequent review.

OVERALL RISK = LOW
9. Protecting Green Belt land (paras 79-92)

| What NPPF expects local plans to include to deliver its objectives | The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82) |
| Questions to help understand whether your local plan includes what NPPF expects | If you are including Green Belt policies, do they accurately reflect the NPPF policy? Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85). |

Does your local plan address this issue and meet the NPPF’s expectations?

There are no designated areas of Green Belt located within the borough and there are no plans to try and establish any (thus nullifying the exceptional circumstances tests set out in paragraph 82).

Consequently, the NPPF references to Green Belt have little relevance to Worthing. Regardless of this it is worth noting that the Core Strategy, in particular Strategic Objectives 1, 2, 4 and 6, as well as Policy 13 (The Natural Environment and Landscape Character), are very much in line with the general objectives of this part of the NPPF. This is because it is made clear that new development should be largely delivered within the existing built-up-area (BUA) boundary of the town.

It is highlighted throughout the Core Strategy that new development needs can be met within the existing BUA and with the exception of the West Durrington Strategic site, development will be delivered primarily on previously developed sites. Strategic Objective 6 sets out a key outcome that the settlement pattern of Worthing should be protected. These aims will help to deliver wider strategic objectives for regeneration and was supported through evidence prepared when the Core Strategy was advanced to adoption (particularly the Strategic Housing Land Availability Assessment (SHLAA) and the Strategic Housing Market Assessment (SHMA)).

Core Strategy Policy 13 does provide some flexibility to allow for the development of countryside based used (agriculture and leisure), but only if it can be demonstrated that the uses are essential or contribute significantly towards meeting wider strategic objectives. Overall, the Core Strategy does provide a strategy (and flexibility) for meeting the identified requirements for sustainable development.

How significant are any differences? Do they affect your overall strategy?

There are no differences of any significance. There is no impact of the overall strategy and there is no need to revise the future work programme.

OVERALL RISK = LOW
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)

<table>
<thead>
<tr>
<th>What NPPF expects local plans to include to deliver its objectives</th>
<th>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Help increase the use and supply of renewable and low carbon energy (97).</td>
</tr>
<tr>
<td>Questions to help understand whether your local plan includes what NPPF expects</td>
<td>Have you planned new development in locations and ways which reduce greenhouse gas emissions?</td>
</tr>
<tr>
<td></td>
<td>Does your plan actively support energy efficiency improvements to existing buildings?</td>
</tr>
<tr>
<td></td>
<td>When setting any local requirement for a building’s sustainability, have you done so in a way that is consistent with the Government’s zero carbon buildings policy and adopt nationally described standards? (95)</td>
</tr>
<tr>
<td></td>
<td>Do you have a positive strategy to promote energy from renewable and low carbon sources?</td>
</tr>
<tr>
<td></td>
<td>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17)</td>
</tr>
</tbody>
</table>

Does your local plan address this issue and meet the NPPF’s expectations?

Climate Change is a key issue and challenge for the town and as such, it is clearly identified within the Core Strategy. There is a specific section on Climate Change within the Issues and Challenges section and it is recognised that adapting to and mitigating against the effects of climate change at the local level can only be achieved through a range of policies and associated documents.

The plan acknowledges that Worthing is likely to expect an increase in the risk of flooding particularly given the local geology. It notes that areas of the borough, which are already at risk of flooding, are likely to experience an increase in frequency and intensity unless mitigating measures are taken to ameliorate the situation. It states quite clearly that the Core Strategy has a key role in reducing the potential impact of flooding, by helping to manage water resources and protecting water quality. This will be achieved by appropriately considering where new development should be located and the introduction of sufficient management and mitigation measures including coastal flood defences.

In line with Planning Policy Statement (PPS) 25, the Council carried out a Strategic Flood Risk Assessment providing a detailed analysis of the areas of Worthing at the greatest risk of flooding and as such provides a robust evidence base for making planning decisions. This PPS has now been superseded by the NPPF and its technical guidance however it is made clear in this document that the key elements
of it have been retained. The approach is one whereby new development in flood zones 2 and 3 (which has not already been sequentially tested through the Core Strategy process) will be assessed for deliverability after having undergone a sequential test. The aim of this test is to steer new development to areas with the lowest probability of flooding.

The Core Strategy Vision makes a clear commitment to mitigating against and adapting to the adverse impacts of Climate Change. This commitment is reinforced in Strategic Objective 1 – Protect the Natural Environment and Address Climate Change. It states that there will need to be a reduced carbon footprint from existing and future businesses, residents, services and visitors and that this will be principally addressed through improved energy efficiency, careful use of water resources, reducing the need to travel, promoting sustainable construction and the use of innovative low carbon energy sources.

Whilst these objectives are a constant thread throughout the plan and all policies, there are key policies that deal specifically with the issues referred to:

- **Policy 15 – Flood Risk and Water Management** – in line with the NPPF this policy ensures that new development is properly assessed for flood risk during the planning process. This policy also supports the aims of the Water Framework Directive, which seeks to protect and enhance the quality of the borough’s surface freshwater areas. It also requires new and existing development to adopt positive mitigation and water management measures to safeguard groundwater supply. All development is required to ensure that there is no net increase in surface water runoff and that appropriate Sustainable Urban Drainage Systems (SuDS) will be implemented at site specific locations.

- **Policy 16 – Built Environment and Design** – this specifically promotes design that reduces energy demand.

- **Policy 17 – Sustainable Construction** – this policy expects all development to contribute to making Worthing a more sustainable place to live by helping reduce its carbon emissions and ensure the town is resilient to the local impacts of Climate Change. It promotes energy efficiency, is consistent with the government’s zero carbon buildings policy and adopts / promotes the national sustainability standards (Code for Sustainable Homes (CSH) and BREEAM). It does not specify standards but rather encourages the delivery of the highest achievable standards for both residential and non-residential development.

- **Policy 18 – Sustainable Energy** – This policy expects all developments to have considered and, where appropriate, deliver sufficient onsite renewable energy generation to meet national standards. It recognises that large development and more specifically the Areas of Change offer the greatest opportunities to deliver on or off site renewable energy generation.

In order to gain an understanding of what opportunities there are within the Borough to deliver renewable energy, the council jointly with other neighbouring local authorities commissioned the West Sussex Sustainable Energy Study 2009. This study assessed the feasibility of using appropriate sustainable energy sources within Worthing and evaluated them in relation to their potential to reduce carbon emissions. This study concluded that there was the potential to incorporate renewable energy and low carbon technologies into developments to reduce the overall CO2 emissions. In particular, it identified the strategic allocation of West Durrington and the Areas of Change as sites where the conditions were likely to favour larger scale more economic and effective forms of
sustainable energy generation such as combined heat and power and district heating.

**How significant are any differences? Do they affect your overall strategy?**

It is considered that overall the approach taken in the Core Strategy to this issue is in general compliance with NPPF. However, the NPPF states quite clearly that ‘planning plays a key role in helping to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.’ It goes to state that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change.

The Council has already identified the need for a further Local Development Document (LDD) to further support its existing policies, to provide more detailed advice on addressing climate change at the local level and to proactively encourage developers to deliver development to the highest achievable levels of sustainable development. This is to be achieved in the medium-term and once adopted, it is considered that the Worthing Local Development Framework (LDF) will be fully compliant with the NPPF regarding Climate Change, flooding and coastal change.

**OVERALL RISK = MEDIUM**
11. Conserving and enhancing the natural environment (paras 109-125)

| What NPPF expects local plans to include to deliver its objectives | Planning policies should minimise impacts on biodiversity and geodiversity (para 117). |

Does your local plan address this issue and meet the NPPF’s expectations?

The Worthing Core Strategy seeks to minimise the impacts of development on the natural environment and where possible enhance it. Part of the overall strategic vision is that:

“The quality of the town’s natural, historical and built environment will continue to improve, with due regard, being given to mitigating against and adapting to the adverse impacts of climate change.”

As identified in the ‘Characteristics of the Borough’ section of the Core Strategy, despite being a predominantly urban borough, Worthing contains a number of environmentally sensitive areas. Worthing’s countryside is of particular quality and importance. Most of the land outside the built up area (BUA) is within the South Downs National Park (SDNP). The borough has eleven Sites of Nature Conservation Importance (SNCI) and a Site of Special Scientific Interest (SSSI) at Cissbury Ring. To the east and west of the borough are areas of valued open countryside creating long established breaks in development between settlements. Worthing also benefits greatly from its coastal setting, with 7.5km of shoreline, with beaches including a variety of flora and fauna. There are also over 360 hectares of parks and open space.

As a result of this, the protection of the identity of the borough remains a high priority. Worthing is constrained by the Sussex coast to the south and the South Downs to the north. As such, there will inevitably be pressure on natural resources and space and this is likely to increase over time as constraints become more acute. Therefore, it is essential that the natural environment is protected and enhanced in the future.

Strategic Objectives and Policies have therefore been written to minimise the impacts on the natural environment. This will seek to retain the biodiversity and geodiversity of the area.

**Strategic Objective 1 - Protect the Natural Environment and Address Climate Change**

New development will be expected to avoid, or where not practical, mitigate any adverse impact on flora and fauna and environmentally sensitive areas. The protection and enhancement of environmental assets will be integral to ensuring a high quality of life. Furthermore, opportunities will be sought to increase the biodiversity of the town, expand the green network and enhance the coastal strip.

Key outcomes include:
- Watercourses, natural environment and valued open spaces are enhanced
- A Green Infrastructure Strategy will be implemented and green corridors and links improved
- Environmental designations, protected species and trees covered by Preservation Orders are all protected.

**Policy 11 – Protecting and Enhancing Recreation and Community Uses**

Development will not be permitted which would lead to the loss, or prejudice the use of land used for recreation and sporting facilities including open spaces (which are an important natural asset for Worthing) unless alternative uses are provided.

**Policy 13 – The Natural Environment and Landscape Character**

As pressure for development grows it remains important to protect and where possible, enhance areas that are important and valued for their nature, flora, fauna, geological and biodiversity conservation. The Worthing Biodiversity Report has identified sites that are of local and national importance in terms of biodiversity protection. These sites contain areas of ancient woodland, chalk grassland, National Trust property and Regionally Important Geological Sites (RIGS) at High Salvington and Charmandean Quarry. Identified sites in the Worthing Biodiversity Report that have local and nationally recognised designations, such as SNCIs and SSSIs will be protected.

The coastal waters of Worthing contain important marine habitats including shallow reefs, chalks cliffs and areas of vegetated shingle. Coastal habitats are one of Worthing’s key environmental assets and opportunities to protect and enhance the area will be sought as part of any development proposals in the seafront area.

**Policy 14 – Green Infrastructure**

Worthing’s green infrastructure includes parks and gardens, amenity green space, natural and semi-natural green space, sports facilities, allotments, beaches and green corridors. Through this policy, Worthing’s green infrastructure areas will be improved and enhanced. The Core Strategy has recognised that further local guidance is required and as such the Council is committed to the production of a Green Infrastructure Strategy (SPD). In light of the changes brought about by the NPPF, it may be that revisions will be necessary to incorporate some of these newer features.

The formulation of this overarching green infrastructure policy provides the strategic policy direction from which the more detailed green infrastructure requirements will flow. This approach will also present opportunities for cross-boundary co-operation between Worthing Borough Council and the neighbouring authorities in Arun and Adur in order to produce joint green infrastructure strategies and policies.

**Saved Policies**

The following Saved Policies are relevant to conserving and enhancing the natural environment and have been assessed in terms of their conformity the NPPF:

**LR4 - Brooklands**

Development in Brooklands is limited to recreational and landscape enhancement opportunities only. Adequate measures will also have to be considered to deal with contaminated land issues and the potential for landfill gas emission. In line with NPPF this policy this serves to protect the recreation function of this area and to help protect the natural environment.
RES7 – Control of Polluting Development

Development, including the intensification of existing uses, which generates or has the potential to generate pollution, will only be permitted where the impact on the natural and built environment, including wildlife and the amenities of local residents, do not cause unacceptable harm. This seeks to protect the natural environment as identified in Policy 13 – The Natural Environment and Landscape Character, which in principle, is in conformity with the NPPF.

Background Documents

The following documents have been used to help inform Policy and Strategic Objectives for the Worthing Core Strategy:
- West Sussex Environment Strategy (2008)
- West Sussex Sustainable Energy study, Centre for Sustainable Energy (2008)
- Desktop Biodiversity Report, Sussex Biodiversity Record Centre (2009)
- South Downs AONB Management Plan (2008)
- Strategic Flood Risk Assessment Study, Capita Symonds (2008)
- Habitat Regulations Assessment (2010)
- PPG17 Study (PMP) Update Note, Worthing Borough Council (2009)
- West Sussex County Council’s Historic Environment Record

How significant are any differences? Do they affect your overall strategy?

The Core Strategy does not specifically refer to the word ‘geodiversity’, although the concept with regards to the natural environment is adequately covered in Policy 13 – The Natural Environment and Landscape Character. According to Natural England, ‘geodiversity is the variety of rocks, minerals, fossils, soils, landforms and natural processes’. Geodiversity provides many of the essential natural resources that society and economic growth depend, including the:

- soils in which we grow our food and timber
- aggregates from which we build our houses, schools and hospitals
- metals and fuels that supply our economic growth
- filtering, purification and storage systems for our water supplies

Geodiversity also plays a key role in environmental regulation including:

- absorbing pollution
- buffering climate change
- filtering, purifying and storing water.

Geodiversity sites are often of great recreational and tourism value and it plays a major role in defining the landscape of an area gives it a sense of place. As such, it is important to protect and where possible enhance these areas.
It is considered that it is not necessary to review the Core Strategy because the word geodiversity is missing, especially when the various concepts it represents are considered in detail within the Core Strategy. The mitigation of climate change and the improvement of the natural environment are key priorities for Worthing Borough and this is reflected in the Policies and Strategic Objectives within the Core Strategy. However, for any future documents, it will be important to use the term geodiversity, particularly the Green Infrastructure Strategy SPD and any relevant emerging background documents and reports.

OVERALL RISK = MEDIUM

<table>
<thead>
<tr>
<th>What NPPF expects local plans to include to deliver its objectives</th>
<th>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</th>
</tr>
</thead>
</table>

Biodiversity Opportunity Areas (BOAs) represent the targeted landscape-scale approach to conserving biodiversity in Sussex. Worthing has two Biodiversity Opportunity Areas, as identified in the Sussex Biodiversity Partnership – the North East Worthing Downs and the Clapham to Burpham Downs, which are identified in the Worthing Core Strategy. Although these areas do not represent a statutory designation they indicate where there are significant opportunities to make positive changes for biodiversity.

BOAs identify where the greatest opportunities for habitat creation and restoration lie, enabling the efficient focusing of resources to where they will have the greatest positive conservation impacts. As a result of Policy 13 – The Natural Environment and Landscape Character, the planning process will play a leading role in not only protecting designation high quality biodiversity in those areas but also providing the opportunity to enhance the quality of the biodiversity where there is no statutory provision to do so.

The Sussex Biodiversity Partnership states that landscape-scale conservation involves identifying opportunities to expand, link and buffer key sites, and increasing the quality of the entire countryside for wildlife. This approach is vital to ensure our species can adapt to the challenge of climate change. In particular, it has identified that more work needs to be carried out to identify marine and urban BOAs. This will be taken into consideration when carrying out future studies and reports, including the Green Infrastructure Strategy SPD.

**How significant are any differences? Do they affect your overall strategy?**

Policy 14 – Green Infrastructure of the Worthing Core Strategy states that a Green Infrastructure SPD will be produced to provide the detailed strategy for implementing the delivery of an integrated green infrastructure network.

In addition, Worthing has commissioned a study with Adur for 2012 for an Open Space Assessment. This is to update the existing Open Space study from 2007 (and updated in 2012) which Sports England advise should be updated every 3 years. This will help to establish the need open space requirements for Adur and Worthing, and will form part of the work on Green Infrastructure. It is likely that this document
will be prepared to cover both Worthing and Adur and will incorporate partnership working, as well as cross border and sub-regional working.

Although the scope of the document has yet to be fully decided, it is likely that in light of the NPPF requirements, it incorporates areas relating to biodiversity and in particular, geodiversity, at a landscape-scale. It also needs to recognise the wider benefits of ecosystem services and establish ecological networks to ensure that all areas of the NPPF are adequately covered by Worthing’s Local Development Framework (LDF). In particular, more work needs to be carried out to identify marine and urban BOAs within the borough.

As such, it can be concluded that the Core Strategy is in conformity with the NPPF in basic principles and that a Green Infrastructure Strategy SPD will provide further details and more guidance to ensure that all areas are covered with regards to conserving and enhancing the natural environment.

**OVERALL RISK = MEDIUM**

<table>
<thead>
<tr>
<th>Conserving and enhancing the natural environment (paras 109-125)</th>
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</thead>
<tbody>
<tr>
<td>Questions to help understand whether your local plan includes what NPPF expects</td>
</tr>
</tbody>
</table>

Currently Worthing has no Nature Improvement Areas identified in the Worthing Core Strategy. However, as part of the Green Infrastructure Strategy SPD, the use of these and the appropriateness for Worthing will be assessed and all efforts to improve biodiversity and geodiversity will be taken into consideration and where possible, incorporated into the study.

**OVERALL RISK = LOW**

50
12. Conserving and enhancing the historic environment (paras 126 – 141)

| What NPPF expects local plans to include to deliver its objectives | There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF. |

Does your local plan address this issue and meet the NPPF’s expectations?

One of the overall strategic visions for Worthing identified in the Core Strategy is that:

“The quality of the town’s natural, historic and built environment will continue to improve”.

As identified in the ‘Characteristics of the Borough’ section of the Core Strategy, much of the built environment and the town’s Victorian heritage is highly valued and the borough include 26 conservation areas, 360 listed buildings and over 1,000 buildings regarded as being of important local interest. The seafront in particular is one of Worthing’s most important assets and includes a variety of historical buildings, gardens and public spaces that contribute towards the identity of the Victorian seaside resort that it once was.

Worthing has many important areas of historic character and heritage together with sites of archaeological importance. As a result, a key objective of the Worthing Core Strategy is to protect and where possible enhance these historic environments. This objective is in line with the NPPF in that it recognises that heritage assets are an irreplaceable resource and aims to conserve them in a manner appropriate to their significance through relevant Strategic Objectives and Policies.

Strategic Objective 6 – Deliver High Quality Distinctive Places

Many parts of the borough already have distinctive characteristics such as parks, listed buildings, and conservation areas. These areas add to the local identity and contribute towards the character and quality of life of the surrounding area. As such, they need to be retained and, where possible, enhanced. A key outcome anticipated as a result of this Strategic Objective is that Worthing’s built heritage and historic assets are conserved and, where appropriate, enhanced.

Policy 1 - West Durrington

Adjoining this Area of Change site is Castle Goring, a Grade I Listed Building, and a surrounding Conservation Area, both of which are listed in the 2012 Heritage at Risk Register. This is one area in which Worthing could enhance its conservation by taking proactive measures to try and restore the Listed Building. With regards to West Durrington, Policy 1 states that there is a need for proposals to have regard to the cultural heritage, particularly in the design of the development.

Policy 16 – Built Environment and Design

In line with Strategic Objective 6 Policy 16 states that the settlement structures, landscape features and buildings which represent the historic character of Worthing should be maintained, preserving and enhancing existing assets. As a result, it can be concluded that Worthing Core Strategy conforms with the NPPF in that has created a positive strategy for the conservation of the historic environment.
Conservation and Heritage

Although the Core Strategy establishes some key principles it is recognised in the Local Development Scheme (LDS) that more detailed guidance is required with regards to Conservation and Heritage for Worthing. It is intended that a Conservation and Heritage guidance document be produced to ensure that the topic area is adequately covered at the local level. This will collate all existing information relating to conservation and heritage issues in Worthing and will consider a timetable for future Conservation Area Appraisals that will be undertaken.

An area that is not really considered in much detail in the Worthing Core Strategy is the need to look for opportunities for new development within Conservation Areas to enhance the areas or better reveal their significance. It is recognised that protecting an area is often much easier than enhancing it and as a result, the Conservation and Heritage document will also consider conservation area management plans and review ways of improving and enhancing existing conservation areas, as well as Listed Buildings, historic parks, scheduled ancient monuments and areas of archaeological importance. This will ensure that Worthing has up-to-date guidance and information that is in complete conformity with the NPPF.

Other SPDs that will contribute towards the protection and enhancement of the historic environment include:

- **Tall Building Strategy SPD** – will provide guidance on Tall Buildings in Worthing and will ensure that only appropriate development is considered in sensitive areas such as Conservation Areas.
- **Housing Design Guide SPD** - will provide guidance on how the location, form and type of all new development in Worthing help achieve a high quality, distinctive, safe and sustainable, built and natural environment.

Background documents that have contributed towards the Policies and Strategic Objectives relevant to the historic environment in the Worthing Core Strategy have included:
- Worthing Evolution Town Centre & Seafront Masterplan (2006)
- West Sussex County Council’s Historic Environment Record
- Listed Buildings Register
- Conservation Area Appraisals

Saved Polices

The following Saved Policies from the Worthing Local Plan (2003) are related to conserving and enhancing the historic environment and conform with Policy 16 – Built Environment and Design and Strategic Objective 6 – Deliver High Quality Distinctive Places.

**CT3 – Protection and Enhancement of Seafront Area**

Development will be permitted on the seafront as long as it respects and where possible, enhances the appearance and character of the seafront and has regard to existing sea views. It also needs to ensure that it is appropriate to its location in terms of density, scale, height, massing, appearance, orientation, layout and siting, both in itself and in relation to adjoining buildings, spaces and views to the sea.
BE25: Environment areas of special character

All development within an Environmental Area of Special Character, will be required to reflect the particular character of the area concerned. Development which would adversely affect the existing features that contribute to its character would not be permitted.

Both Saved Policies are in line with the objectives of the NPPF to conserve and enhance the historic environment.

How significant are any differences? Do they affect your overall strategy?

There are no new or significantly different requirements for the policy context of requiring good design. As a result, the Core Strategy remains in line with regards to previous policies and is therefore in conformity with the NPPF.

However, further work to progress a local Conservation and Heritage guidance document will be undertaken. This will go into further detail than that set out in the Core Strategy with regards to protecting the historic environment, but more importantly to enhance the area too.

OVERALL RISK = MEDIUM
13. Facilitating the sustainable use of minerals (paras 142-149)

| What NPPF expects local plans to include to deliver its objectives | It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142). |
| Questions to help understand whether your local plan includes what NPPF expects | Does the plan have policies for the selection of sites for future peat extraction? (143) |

Does your local plan address this issue and meet the NPPF’s expectations?

Worthing operates within a ‘two-tier’ system of local government in which the County Council is responsible for some things (including minerals and waste planning) and the Borough Council is responsible for the rest. As such, much of the content of the NPPF in relation to minerals is more relevant to the County Council rather than the Borough Council. Furthermore, there is no need to include policies for the extraction of mineral resource of local and national importance and no need to define Mineral Safeguarding Areas. In addition, given the character of the Borough (mainly urban) and the geology of the surrounding area the references to peat extraction are of little relevance.

How significant are any differences? Do they affect your overall strategy?

There is no impact on overall strategy.

OVERALL RISK = LOW
Part 3 – Planning Policy for Traveller Sites

This section of the assessment reviews the current and future policy position for travellers against the requirements of the NPPF and ‘Planning policy for traveller sites’ (March 2012). Consistent with the rest of this document, the level of ‘conformity risk’ is identified for each section and, where appropriate, mechanisms to address any deficiency are set out.

<table>
<thead>
<tr>
<th>Policy A: Using evidence to plan positively and manage development (para 6)</th>
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</thead>
<tbody>
<tr>
<td><strong>What the policy for traveller sites expects local plans to include to deliver its objectives</strong></td>
</tr>
<tr>
<td><strong>Questions to help understand whether your local plan includes what the policy expects</strong></td>
</tr>
</tbody>
</table>

Does your local plan address this issue and meet the NPPF’s expectations?

The current approach to the delivery of Gypsy and Traveller and Travelling showpeople sites is one that reflects the outcome of an earlier accommodation needs assessment study. This study indicated a very low level of need for Worthing and that this level would not support a viable and managed permanent site. In addition, it recognised that given the locational constraints of the borough, identifying sites would be problematic. The approach therefore, was one that sought to work at a sub regional level and consider a joint strategy for site delivery. This approach was supported by the Inspector at the public examination into the Core Strategy.

The Core Strategy makes the following statement in connection with Travellers: ‘Local studies have gathered information on the requirements for gypsy and traveller sites in West Sussex. In comparison to the other districts in West Sussex Worthing has the smallest quantity and demand for gypsy and traveller sites and, as such, the evidence does not justify the need for specific allocations for any designated traveller’s sites in the borough. The 2008 SEERA consultation on gypsy / traveller sites and pitches in the South East identified a need for between two and four additional pitches in Worthing between 2006 and 2016. This level of site provision
would not support a viable and managed permanent site. Given this very low requirement in Worthing it is considered that the most appropriate approach is to address the needs of gypsies and travellers within a sub-regional context. A joint strategy in this regard would be able to provide a consistent and deliverable policy approach for site delivery. This work will be progressed by 'Coastal West Sussex' which is an existing partnership of local authorities and other organisations committed to developing the areas 'infrastructure' in a way that is sustainable and achieves the best economic, social and environmental gains. Officer and Member discussions relating to the gypsy and traveller review are on-going. Any specific sites identified through this sub-regional work would then need to be progressed by the relevant local authority through a subsequent Development Plan Document.

The first phase of this work is well underway. This stage seeks to develop a clear understanding of the needs of the Traveller community across Coastal West Sussex including those parts of the South Downs National Park Authority (SDNPA) that are within the Local Authority boundaries. This work is being carried out with the support of WSCC. The local authorities involved in this study are Adur, Chichester and Arun together with the SDNPA. Fundamental to all stages of the first stage of work has been engaging with the Traveller community and those bodies and groups that represent them together with other individuals and interest groups that represent the interest of this community and the settled community.

A key element of this task has been working collaboratively with neighbouring local planning authorities given the cross boundary nature of this issue. In line with current Government advice, the new study is looking at the need over the lifetime of the plan and will seek to ensure that identified sub-regional needs are delivered within appropriate time scales over the plan period until 2026.

It is considered that this work will provide a robust evidence base on which to build a future policy approach. It will identify the need for sites across the study area which can then be feed into the phase two part of the part which will look to identify sites the meet the identified need. At that point, if a need to allocate a site(s) has been identified then it is expected that this will be advanced through a DPD progressed by the relevant LPA(s).

How significant are any differences? Do they affect your overall strategy?

The previous accommodation assessment study in 2006 covered a much wider area and did involve a significant amount of public engagement, however there were concerns raised in respect of its methodological approach which led to a number criticisms against it. This current study has built on the lessons learnt from that study and has been developed in line with the approach in the NPPF and the 'Planning Policy for Traveller Sites' recently published.

Although the Core Strategy establishes the key principles for Travellers it lacks some of the detail that would perhaps now be expected by the NPPF. However, the Core Strategy commits to progressing further work across the sub-region and this work is now well underway. When complete, it will provide clear evidence of cross boundary working and the needs across the sub-region. In addition, a comprehensive programme of engagement will ensure that the Council has a clear understanding of the needs of the Traveller community over the Plan period. It is therefore considered that the approach being taken is consistent with the objectives of the NPPF.

OVERALL RISK = MEDIUM
## Policy B: Planning for traveller sites (paras 7-11)

| What the policy for traveller sites expects local plans to include to deliver its objectives | Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring Lpas (8)  
Consider the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying site.  
Relate the number of pitches and plots to the circumstances of the specific size and location of the site and the surrounding population size and density.  
Protect local amenity and environment.  
Set criteria to guide land supply allocations where there is identified need.  
Ensure that traveller sites are sustainable economically, socially and environmentally. |
|---|---|
| Questions to help understand whether your local plan includes what the policy expects | Have you identified, and do you update annually, a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set targets? Have you identified a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. (9)  
Have you identified constraints within your local area which prevent you from allocating sufficient sites to meet likely future need? If so have you prepared a joint development plan or do you intend to do so? Is the reason for this clearly explained?  
Has an up-to-date assessment of the need for traveller sites been carried out? If an unmet need has been demonstrated has a supply of specific, deliverable sites been identified based on the criteria you have set? Where there is no identified need, have criteria been included in case applications nevertheless come forward?  
Have your policies been developed taking into account criteria a-h of para 11 of the policy |
Does your local plan address this issue and meet the NPPF’s expectations?

As addressed above the current Core Strategy does not identify sites. However, the approach to site allocation may change as a result of the current study. The study will indicate whether sites within the borough are required.

- Phase 1 of the study will consider the level of need for travellers and identify broad locations for these and transit sites.

- Phase 2 of the study will involve site identification of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against local set targets. It will also consider the supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, 11-15.

In considering appropriate sites, careful consideration will be given to ensuring that sites are sustainable economically, socially and environmentally. Site assessments will take into account factors such as site size, access to facilities, social and utility infrastructure, highways issues, and environmental constraints etc. A further element of the study will consider how any identified need can be met. If there is no identified need then consideration will be given to the need for a criteria based policy to guide any future applications. The current accepted approach is that there is sufficient national guidance to guide any such application in the absence of locally defined criteria. As part of the current study the consultants will make recommendations as to the appropriate criteria that should be used to assess sites and determine planning applications.

This work, as indicated above, is being carried out collaboratively with neighbouring authorities and in close liaison with stakeholder groups. Consideration will be given to the production of a joint development plan for site allocation subject to the findings of the current study.

The Core Strategy currently refers to the production of a relevant local authority Development Plan Document however, in light of results of the study and the NPPF consideration will be given as to the most appropriate course of action.

How significant are any differences? Do they affect your overall strategy?

It is not considered that there any significant differences between the objectives and requirements of the NPPF and the approach established in the Core Strategy and work currently being progressed jointly with neighbouring authorities.

It is acknowledged that Worthing does not currently have a criteria based local policy to help assess and determine any relevant applications that may come forward. The Inspector at the Examination into the Core Strategy did accept that there was sufficient national guidance to guide any application until a new study was undertaken. As indicated above the consultants undertaking the current study will make recommendations as to the appropriate criteria to be used to assess any potential applications. The Council will consider the best mechanism / document through which this will be progressed.

OVERALL RISK = MEDIUM
Policy C: Sites in rural areas and the countryside (para 12)

| What the policy for traveller sites expects local plans to include to deliver its objectives | When assessing the suitability of sites in rural or semi-rural settings, LPAs should ensure that the scale of such sites do not dominate the nearest settled community? |

Does your local plan address this issue and meet the NPPF's expectations?

Worthing is principally urban in character and contains no rural settlements. Most of the rural land falls within the South Downs National Park and the National Park Authority is the local planning authority for these areas. The other areas of countryside to the west and east of Worthing are highly valued.

As such, this element is of very little relevance to Worthing. Any criteria developed to assess suitable sites across the sub-region will accord with the requirement not to dominate settlements in close proximity.

OVERALL RISK = LOW

Policy D: Rural exception sites (para 13)

| What the policy for traveller sites expects local plans to include to deliver its objectives | If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites. |

Questions to help understand whether your local plan includes what the policy expects

| Questions to help understand whether your local plan includes what the policy expects | If you have a lack of affordable land to meet local traveller needs in your rural area have you used a rural exception site policy, and if so, does it make it clear that such sites shall be used for affordable traveller sites in perpetuity? |

Does your local plan address this issue and meet the NPPF’s expectations?

See response to Policy C above

OVERALL RISK = LOW

Policy E: Traveller sites in Green Belt (paras 14-15)

| What the policy for traveller sites expects local plans to include to deliver its objectives | Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development. |

Questions to help understand whether your local plan includes what the policy expects

| Questions to help understand whether your local plan includes what the policy expects | Have you made an exceptional limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site? Has this alteration been done through the plan-making process? |
Does your local plan address this issue and meet the NPPF’s expectations?

This section of the NPPF is of little relevance to Worthing as there are no areas of Green Belt located within the Borough.

OVERALL RISK = LOW

<table>
<thead>
<tr>
<th>Policy F: Mixed planning use traveller sites (paras 16-18)</th>
</tr>
</thead>
</table>
| Questions to help understand whether your local plan includes what the policy expects | Have you considered including travellers sites suitable for mixed residential and business use? If mixed sites aren’t practicable have you considered the scope for identifying separate sites for residential and for business purposes in close proximity to one another?  
   Have you had regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment? |

Does your local plan address this issue and meet the NPPF’s expectations?

The current study is considering the accommodation needs of the Traveller community and will be followed by further work to assess suitable and deliverable sites to meet the identified need. Consideration will be given to both the residential and business requirements of Travellers as part of this work and how, if appropriate, they can be combined. The needs of Travelling showpeople (to include consideration of storage needs) is also being considered as part of the on-going accommodation needs assessment.

OVERALL RISK = LOW

<table>
<thead>
<tr>
<th>Policy G: Major development projects (para 19)</th>
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<tbody>
<tr>
<td>Questions to help understand whether your local plan includes what the policy expects</td>
</tr>
</tbody>
</table>

Does your local plan address this issue and meet the NPPF’s expectations?

Worthing does not have any existing Traveller sites and therefore this part of the NPPF is not relevant.

OVERALL RISK = LOW
## Part 4 – Plan-Making

<table>
<thead>
<tr>
<th>Local Plans (paras 150-157)</th>
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<tbody>
<tr>
<td><strong>What NPPF identifies in relation to the development of local plans</strong></td>
</tr>
<tr>
<td>Each local planning authority should produce a Local Plan for its area. Any additional DPDs should only be used where clearly justified. SPDs should be used where they help applicants make successful applications/aid infrastructure delivery/not be used to add unnecessarily to financial burdens on development (153).</td>
</tr>
<tr>
<td><strong>Questions to help understand whether your local plan includes what NPPF expects</strong></td>
</tr>
<tr>
<td>Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?</td>
</tr>
</tbody>
</table>

**Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)?**

The work programme for the Worthing Planning Policy Team is set out within the Local Development Scheme (LDS). The latest approved version of the LDS is dated February 2012.

There is currently no commitment to progress any additional DPDs to support the Core Strategy. However, the LDS does include a measure of flexibility in that it explains circumstances when a DPD could be required – for example, if housing need / delivery dictates that additional greenfield sites are required, or if the Gypsy & Traveller’s needs assessment provides the evidence that means additional pitches are required in the Borough.

There is no expectation in the short to medium term that this approach to the work programme will change (i.e. that any additional DPDs will be advanced). However, given the changes in the planning system (particularly the impact of the NPPF and Duty to Co-operate considerations), it is important that the Core Strategy is continually monitored to ensure it is meeting objectively assessed need and conforming with higher level plans / guidance.

In line with the NPPF a number of SPDs are either included in the work programme or have already been approved. These have been (or are being) prepared to provide additional advice and clarity to applicants on issues of local relevance. This in turn should help applicants to make successful applications.

One of the over-arching aims in the Borough is to encourage the regeneration and redevelopment of certain areas of the town and for this reason care will be taken to ensure that further guidance does not add unnecessary financial burdens on development. Furthermore, the viability assessment that has recently been undertaken to inform the Council’s emerging Community Infrastructure Levy (CIL) takes all financial requirements into account and in doing so helps to provide an understanding of the overall package of infrastructure requirements and its impact of viability.
Does your local plan meet the NPPF’s expectations? How significant are any differences?

The Council has a Development Plan in place – in the form of the Worthing Core Strategy April 2011. The document was prepared over a number of years following many stages of consultation and engagement with local stakeholders. The Core Strategy was prepared with the objective of contributing to the achievement of sustainable development and, as this self-assessment has helped to demonstrate, is very much aligned to the key priorities and aims of the NPPF.

The Core Strategy reflects the NPPF in many respects in that it is written positively in a way that is aspirational but realistic. The Core Strategy clearly sets out a set of strategic priorities and objectives that are then reflected in the delivery strategy and associated policies. Again, reflecting the NPPF, the Core Strategy covers an appropriate timescale of 15 years.

There are no additional DPDs planned within the work programme so there is no need to justify this approach. However, the Council acknowledges that with changing circumstances (the economy, the planning system etc) there is a need to retain a level of flexibility. As explained in the Core Strategy, this flexibility, and the ability to bring forward additional DPDs if required, will allow for the local planning framework to respond appropriately to any significant changes.

The work programme for the progression of Supplementary Planning Documents is in line with the requirements of the NPPF in that this guidance will assist in helping applicants make successful applications whilst also addressing key local planning issues.

OVERALL RISK = LOW

<table>
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<tr>
<th>Local Plans (paras 150-157)</th>
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<tbody>
<tr>
<td><strong>What NPPF identifies in relation to the development of local plans</strong></td>
</tr>
<tr>
<td><strong>Questions to help understand whether your local plan includes what NPPF expects</strong></td>
</tr>
</tbody>
</table>

Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)?

The over-arching vision and objective within the Core Strategy is for development to provide the impetus for regeneration to ensure that Worthing plays a leading role within the wider sub-region. For this reason, the plan was written positively to encourage appropriate development, whilst at the same time seeking to protect the borough’s important environmental and heritage assets.

Local and regional evidence (e.g. Strategic Housing Market Assessment (SHMA), Infrastructure Delivery Plan (IDP) and Economic Studies) was used to inform the plan as it was progressed and this work objectively assessed local needs in Worthing. It
also took into account the significant development constraints within and around the built up area (BUA) of the town. Through the South East Plan, a balanced approach was taken with regards to growth across the sub-region and it was agreed locally, and with neighbouring authorities, that the levels of development allocated to Worthing were appropriate for the Borough.

Worthing forms part of the 'Sussex Coast' sub-region where there is in an identified aim to secure sustainable economic regeneration and substantially reduce social and economic disparities, whilst protecting and enhancing the environment and quality of life for residents. As such, work was undertaken across this geographic area (e.g. SHMA) to ensure that plans were ‘joined-up’ and co-ordinated.

The neighbouring authority with the greatest linkages with Worthing is Adur District Council. In 2007, Adur District Council and Worthing Borough Council formally agreed to enter into a joint working partnership for the delivery of local services using a single workforce and senior officer structure. This has resulted in significant savings through an increase in joint / partnership working and shared resources.

**Does your local plan meet the NPPF’s expectations? How significant are any differences?**

The Core Strategy was objectively assessed against identified needs and the development strategy and associated policies reflects this. This relationship between need and delivery was one of the key tests at the public examination. However, it should be acknowledged that the Core Strategy was advanced against the back-drop of the South East Plan (which set housing targets etc) rather than the NPPF and ‘Localism agenda’ (which allows for local communities to consider levels of growth in relation to identified need).

Working in partnership with neighbouring authorities during the preparation and implementation of the South East Plan helped to ensure that the levels of growth allocated to Worthing were appropriate given local constraints and sub-regional considerations. Despite this, the Council now needs to reassess its position in light of the NPPF / localism agenda.

Work is being undertaken on a sub-regional SHMA update which will help to provide a local housing needs assessment for Worthing. A study will then be commissioned to consider these findings within the context of the sub-region. This updated evidence, along with continued working with neighbouring authorities, will influence if and when a review of the Worthing development strategy is required. Early indication is that, in this regard, this is unlikely to be the case at this time.

Although Worthing did co-operate with neighbouring authorities when preparing its Plan it would be fair to say that this process was not audited or reported in the manner that is now expected by the requirements of the NPPF. For this reason, there is now an even greater need for cross boundary working and co-ordination to better align economic and housing growth and deliver infrastructure in a timely manner. Duty to co-operate working groups have been established and studies have been commissioned. As a result, cross boundary working will be more firmly embedded within the process during any subsequent review of the Development Plan.

**OVERALL RISK = MEDIUM**
Using a proportionate evidence base

<table>
<thead>
<tr>
<th>What NPPF identifies in relation to the development of local plans</th>
<th>Ensuring that proportionate and robust evidence is in place. Defence, national security, counter-terrorism and resilience (Para 163)</th>
</tr>
</thead>
</table>

Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)?

The Council’s Local Development Framework (LDF) does not currently provide explicit reference or acknowledgement to issues relating to defence, national security, counter-terrorism and resilience. However, more generally, the Core Strategy (with clear linkages to the Sustainable Community Strategy) does set out an aim (Strategic Objective 5) to deliver safer places and reduce the rates of crime and fear of crime.

In other respects the ‘sound’ findings of the Inspector demonstrated that a proportionate evidence base was used to inform the progression of the Core Strategy. The evidence base covered all other issues and elements identified in this section of the NPPF – housing, business, infrastructure, environment, heritage, etc.

Does your local plan meet the NPPF’s expectations? How significant are any differences?

There is no clear local reference to this particular wording suggested in the NPPF. Whilst not belittling the importance of these measures set out in the national framework, it is considered that compared to some areas of the country Worthing is relatively low risk in this respect (i.e. there are no significant military facilities or potential targets such as ports, airports, powers stations or places where very large numbers gather).

Although there is a clear difference between the NPPF and the current local Development Plan, for the reasons given above, this is not considered to be reason enough to consider a review of the Core Strategy at this time. However, any subsequent review will need to consider and refer to this issue to help ensure that local policies are prepared in full conformity with the national framework.

Although the Council’s evidence base was robust enough to support the Core strategy at Examination effort must be made to ensure that it is sufficiently up to date. In the main, the evidence was collated in the lead up to the Core Strategy Examination and was prepared against the backdrop of the South East Plan. The need to refresh evidence will not only allow for more up to date information but will also provide an opportunity to tailor the evidence so that it is more aligned to the requirements of the NPPF rather than the South East Plan.

OVERALL RISK = LOW
Using a proportionate evidence base

<table>
<thead>
<tr>
<th>What NPPF identifies in relation to the development of local plans</th>
<th>Ensuring viability and deliverability</th>
</tr>
</thead>
<tbody>
<tr>
<td>The sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (173)</td>
<td>To what extent has your plan been assessed to ensure viability, taking into account the costs of any requirements likely to be applied to development?</td>
</tr>
<tr>
<td>In so doing to what extent has it taken into account the normal cost of development and on-site mitigation and provide competitive returns to a willing land owner / developer (173)?</td>
<td>To what extent have the likely cumulative impacts on development of all existing and proposed standards been assessed to ensure that the cumulative impact does not put implementation of the development plan at serious risk (174)?</td>
</tr>
</tbody>
</table>

Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)?

The over-arching vision and objective within the Core Strategy is for development to provide the impetus for regeneration. From the outset it was therefore clear that obligations and policy burdens should not be such that they could make development proposals unviable.

Although development values in Worthing are relatively high, the Council is very aware that land values are also high and that development costs are often above average. For this reason, and supported by local evidence (e.g. IDP, affordable housing viability assessment etc.), the Council sought to adopt realistic policies that would deliver appropriate levels of infrastructure and affordable housing, but not such that would make the majority of development unviable.

As an example, Core Strategy Policy 10 seeks to deliver 30% affordable housing on site of 15+ houses. The affordable housing viability assessment supported this level but also suggested that 40% might be achievable on larger sites in a more buoyant market. To ensure that sites remained viable and to assist in bringing forward development the decision was taken that 30% was the appropriate level.

Furthermore, although the Core Strategy provides a firm basis for the collection of infrastructure monies the policies were drafted so that there is a level of flexibility to allow for reduced levels (financial burden) for developers able to provide robust justification relating to scheme viability. This helps to ensure that important development sites continue to come forward whilst at the same time delivering the maximum (but realistic) levels of infrastructure needed to support that growth. This realistic / flexible approach has been reflected in recent negotiations to bring forward important regeneration sites in the Borough (e.g. The Warren, Teville Gate, Northbrook College).
To help ensure that the appropriate balance was struck between the impacts of policy requirements (local and national) and development viability the Core Strategy was progressed in close consultation with developers and landowners. No objections were received in this regard during the Examination stages.

**Does your local plan meet the NPPF’s expectations? How significant are any differences?**

As explained, the impact of policies (local and national) on development viability was given close consideration as the Core Strategy was progressed. The Council was keen to avoid setting any policy requirements at such a level that may prevent or deter developments from coming forward and thereby impacting negatively on overarching regeneration objectives.

Given the above, the Council is confident that the policy requirements are not unduly onerous, particularly as there is an allowance for flexibility in exceptional circumstances to ensure scheme viability. Despite this, it would be fair to say that the cumulative impacts of all policy requirements would need to have been assessed and reported more comprehensively under the requirements of the NPPF than there were at the time the Core Strategy was prepared and Examined.

This partial difference between the Core Strategy position and the NPPF requirements will be partly addressed through work currently being undertaken to progress the Community Infrastructure Levy (CIL). CIL is a new tariff which will allow funds to be raised from new building projects in Worthing. The money raised must be used to help fund a wide range of infrastructure to support development across the Council’s area.

When setting rates for CIL in its charging schedule, the Council must aim to strike what appears to be an appropriate balance between the desirability of funding the total cost of infrastructure required to support development of its area and the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development. Furthermore, development costs must be taken into account to include the cumulative impacts of all local and national policy requirements. This must be assessed along with the cost of total infrastructure and other actual and expected sources of funding must be taken into account, leaving a ‘funding gap’ which could be filled by CIL revenues. In striking what appears to be an appropriate balance, the charging schedule must be informed by relevant evidence.

In line with the NPPF, the requirements of the Core Strategy along with all other development costs are not such that they would put the implementation of the Development Plan at serious risk. The progression of CIL in Worthing now allows for a more comprehensive assessment of these variables. The CIL charge will take all development requirements into account and will be set at a level that will not hinder or slow the delivery of important regeneration sites in the borough.

Although work to progress CIL will help to provide a wider understanding of the cumulative impacts on development of all existing and proposed standards it is acknowledged that this won’t be applied retrospectively or will comprehensively address all requirements in the Plan (as would be expected if preparing the document for Examination under the NPPF). However, this work, and subsequent assessments, will ensure that these tests will be applied vigorously when all future Development Plan Documents are advanced.

**OVERALL RISK = MEDIUM**
Examining Local Plans

| What NPPF identifies in relation to the development of local plans | Authorities should submit a plan for examination which it considers is sound, including being .... positively prepared |

Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)?

Worthing Council’s Plan (i.e. the Core Strategy) was positively prepared and was submitted for Examination in July 2010. During November 2010 the Plan was then examined by Planning Inspector Christine Downes. Her report was received in March 2011 and she supported the Council in all its key proposals. She concluded that:

‘There is a clear vision at the heart of the Core Strategy of a thriving, prosperous and healthy town that plays a central role in the wider sub region.’

All background documents including the Inspector’s Report and other documents relating to the Examination can be viewed on the Council’s website.

Does your local plan meet the NPPF’s expectations? How significant are any differences?

The Council’s Core Strategy was adopted in April 2011 following a number of years of preparation and a public Examination. The document, which forms the key part of the Local Development Framework (LDF), was designed to help guide planning and development in the borough up to 2026. It was intended to be used to help inform decision making on all planning applications and it will also provide the context for all subsequent Local Development Documents and their policies.

Although the plan was prepared against previous legislation, paragraph 211 of the NPPF clarifies that the ‘policies of the Local Plan should not be considered to be out of date simply because they were adopted prior to the publication of this framework’. In any case, this self-assessment has demonstrated that the Core Strategy is very much aligned with the key principles established in the NPPF.

OVERALL RISK = LOW
Conclusion

The Council is confident that a full, formal review of the Core Strategy is not necessary at this time. The Core Strategy was adopted relatively recently in April 2011, and it follows the core elements, principles and objectives of the NPPF.

Furthermore, there are no areas of the NPPF identified as low conformity or in direct conflict. However, the assessment has shown that there are a few areas where particular wording or concepts are not used in the Core Strategy, often because they have been newly introduced by the NPPF. There are also instances where the evidence is either partially out of date or is likely to be in the near future and therefore new studies will be required in the short-term to ensure that the Local Development Framework as a whole fully complies with the NPPF. Similarly, there are instances where it has already been identified in the Core Strategy that Local Development Documents (LDDs) such as Supplementary Planning Documents (SPDs) would be produced to provide further detail and provide more technical guidance about particular local issues in order to fully comply.

Worthing Council has produced a summary table of the risks each topic of the NPPF presents based on the above assessment (see Appendix 1). Of those identified as amber (there are no ‘red’ risks identified) a separate table has been produced (Appendix 2). These risks will then be prioritised in terms of their level of potential impact and/or the need for additional planning guidance at the local level in either the short or medium-term. Those with the highest assessed risk will be dealt with first and the timetabling as set out by the Local Development Scheme may be amended where necessary and appropriate.

Outcomes

The detailed self-assessment that has been undertaken has provided comfort that, in most respects, the Council’s key Development Plan conforms closely to the key aims and objectives of the NPPF. The publication of this document will enable interested parties to understand the level of conformity of the Worthing Core Strategy with the NPPF. The exercise has also helped to inform the work programme and prioritise individual projects, where gaps and risks have been identified. In this respect, key areas of work include a Gypsy and Traveller study, the updating of local housing evidence and Duty to Co-operate discussions.
Appendices

Appendix 1 - Summary of Worthing Core Strategy and NPPF Conformity

<table>
<thead>
<tr>
<th>NPPF Section</th>
<th>RISK Level</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Part 1 - Achieving Sustainable Development</strong></td>
<td></td>
</tr>
<tr>
<td>Presumption in favour of sustainable development</td>
<td>MEDIUM</td>
</tr>
<tr>
<td><strong>Part 2 - Delivering Sustainable Development</strong></td>
<td></td>
</tr>
<tr>
<td>1 Building a strong, competitive economy</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>2 Ensuring the vitality of town centres</td>
<td>LOW</td>
</tr>
<tr>
<td>3 Supporting a prosperous rural economy</td>
<td>LOW</td>
</tr>
<tr>
<td>4 Promoting sustainable transport</td>
<td>LOW</td>
</tr>
<tr>
<td>5 Supporting high quality communications infrastructure</td>
<td>LOW</td>
</tr>
<tr>
<td>6 Delivering a wide choice of high quality homes</td>
<td>LOW</td>
</tr>
<tr>
<td>7 Requiring good design</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>8 Promoting healthy communities</td>
<td>LOW</td>
</tr>
<tr>
<td>9 Protecting Green Belt land</td>
<td>LOW</td>
</tr>
<tr>
<td>10 Meeting the challenge of climate change flooding and coastal change</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>11 Conserving and enhancing the natural environment</td>
<td>LOW</td>
</tr>
<tr>
<td>12 Conserving and enhancing the historic environment</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>13 Facilitating the sustainable use of minerals</td>
<td>LOW</td>
</tr>
</tbody>
</table>
### Part 3 - Planning Policy for Traveller Sites

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Using evidence to plan positively and manage development</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>B</td>
<td>Planning for traveller sites</td>
<td>MEDIUM</td>
</tr>
<tr>
<td>C</td>
<td>Sites in rural areas and the countryside</td>
<td>LOW</td>
</tr>
<tr>
<td>D</td>
<td>Rural exception sites</td>
<td>LOW</td>
</tr>
<tr>
<td>E</td>
<td>Traveller sites in Green Belt</td>
<td>LOW</td>
</tr>
<tr>
<td>F</td>
<td>Mixed planning use traveller sites</td>
<td>LOW</td>
</tr>
<tr>
<td>G</td>
<td>Major development projects</td>
<td>LOW</td>
</tr>
</tbody>
</table>

### Part 4 - Plan-Making

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Plans</td>
<td>LOW  MEDIUM</td>
</tr>
<tr>
<td>Using a proportionate evidence base</td>
<td>LOW  MEDIUM</td>
</tr>
<tr>
<td>Examining Local Plans</td>
<td>LOW</td>
</tr>
</tbody>
</table>

### Risk Level:

- **LOW**: Policies are in conformity with the NPPF and no further action is required or the differences are not applicable to Worthing.
- **MEDIUM**: Policies are in general conformity with the NPPF and future documents will be produced to compensate for any ‘gaps’.
- **HIGH**: Policies are in conflict with the NPPF and immediate action is required or a review of the Core Strategy is required.
### Appendix 2 – Summary of risks and how these risks will be mitigated

<table>
<thead>
<tr>
<th>Estimated Time scale</th>
<th>NPPF Section</th>
<th>Conformity Level</th>
<th>Mitigating the Risks</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Part 1 - Achieving Sustainable Development</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Short-term</td>
<td>Presumption in favour of sustainable development</td>
<td>MEDIUM</td>
<td>- WBC needs to reassess its position through Localism Act interpretation in light of both local needs and Duty to Co-operate requirements.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Sub-regional SHMA update currently being carried out.</td>
</tr>
<tr>
<td><strong>Part 2 - Delivering Sustainable Development</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Medium-term</td>
<td>Building a strong, competitive economy</td>
<td>MEDIUM</td>
<td>- Evidence base for economic policies needs to be updated in the near future to provide a clearer picture of the impact of the recession on the local economy.</td>
</tr>
<tr>
<td>Medium-term</td>
<td>Ensuring the vitality of town centres</td>
<td>MEDIUM</td>
<td>- Retail updates of local shopping centres and parades to look at their vitality - required to ensure that policies are still necessary to protect these areas (or whether zones should be extended).</td>
</tr>
<tr>
<td>Short and medium-term</td>
<td>Delivering a wide choice of high quality homes</td>
<td>MEDIUM</td>
<td>- WBC needs to reassess its position through Localism Act interpretation in light of both local needs and Duty to Co-operate requirements.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Sub-regional SHMA update currently being carried out. This will ensure that objectively based needs are met and that approach is in line with NPPF. Early indication is that current approach likely to remain robust.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Consideration will be given to whether additional local guidance on appropriate densities and development in residential gardens can be given within the emerging Housing Design Guide SPD.</td>
</tr>
<tr>
<td>Medium-term</td>
<td>Requiring good design</td>
<td>MEDIUM</td>
<td>- The following SPDs and Technical Notes will be progressed to provide further details and guidance on design issues: Housing Design Guide SPD; Tall Building Strategy SPD; Conservation and Heritage SPD; Domestic Extensions Technical Note.</td>
</tr>
<tr>
<td>Medium-term</td>
<td>Meeting the challenge of climate change flooding and coastal change</td>
<td>MEDIUM</td>
<td>- Need to respond to changes at the national level within all future documents and an SPD may be appropriate in the future.</td>
</tr>
<tr>
<td>Medium-term</td>
<td>Conserving and enhancing the natural environment</td>
<td>MEDIUM</td>
<td>- A Green Infrastructure Strategy (SPD) is due to be produced in the future, which will be in full conformity with the NPPF.</td>
</tr>
<tr>
<td>Medium-term</td>
<td>Conserving and enhancing the historic environment</td>
<td>MEDIUM</td>
<td>- A Conservation and Heritage document will be produced in the future, which will go into further detail with regards to protecting the historic environment and will fully comply with the NPPF.</td>
</tr>
</tbody>
</table>

**Part 3 - Planning Policy for Traveller Sites**

| Short-term | Using evidence to plan positively and manage development | MEDIUM | - Phase 1 of the Gypsy and Traveller needs assessment is currently being carried out, which will feed into Phase 2 of the assessment. This will identify specific sites if a need is found for Worthing. A Development Plan Document would then be prepared to allocate sites. |
| Short-term | Planning for traveller sites | MEDIUM | - Phase 1 of the Gypsy and Traveller needs assessment is currently being carried out, which will feed into Phase 2 of the assessment. This will identify specific sites if a need is found for Worthing. A Development Plan Document would then be prepared to allocate sites. |

**Part 4 - Plan-Making**

| Short and medium-term | Local Plans | MEDIUM | - WBC needs to reassess its position through Localism Act interpretation in light of both local needs and Duty to Co-operate requirements. - Sub-regional SHMA update is currently being carried out. This will ensure that objectively based needs are met and that the approach is in line with the NPPF. Early indication is that current approach likely to remain robust. |
| On-going | Using a proportionate evidence base | MEDIUM | - Worthing Borough Council will ensure that the evidence base is kept up to date to ensure that future documents comply fully with the NPPF. - Viability work being carried out to inform CIL will ensure that viability work is as comprehensive as the NPPF now requires and will ensure that the rates set for Worthing allow development to remain viable. |
Appendix 3 – List of Contents, Strategic Objectives, Policies and Areas of Change in Worthing Core Strategy

In the main section of the report, various sections of the Core Strategy are referred to. The main sections, Strategic Objectives, Policies and Areas of Change are identified below (with the page number of the Core Strategy in brackets), to help with cross-referencing.

Section A – Introduction, Context and Vision

Introduction (6)
Characteristics of the Borough (12)
Issues and Challenges (20)
Vision and Strategic Objectives (32)

Section B – Delivering the Vision

- The Spatial Strategy – Where Should it Happen? (42)
- Delivering the Vision – Enabling Regeneration (48)
- Delivering the Vision – Housing and Infrastructure (84)
- Delivering the Vision – Sustainable Environment (96)

Section C – Implementation and Monitoring

- Implementation (112)
- Monitoring (116)

Section D – Appendices

- List of Appendices (119)
- Appendix 1 – Monitoring Framework and Policy Linkages (121)
- Appendix 2 – Strategic Risk Appraisal (131)
- Appendix 3 – Core Strategy Key Stages (133)
- Appendix 4 – Evidence Base (135)
- Appendix 5 – Housing Trajectory (141)
- Appendix 6 – Saved Local Plan Policies (147)
- Glossary (149)
- Proposals Map (153)

Strategic Objectives

SO1 – Protect the Natural Environment and Address Climate Change (33)
SO2 – Revitalise Worthing’s Town Centre and Seafront (34)
SO3 – Deliver a Sustainable Economy (35)
SO4 – Meet Worthing’s Housing Needs (36)
SO5 – Reduce Social and Economic Disparities and Improve Quality of Life (37)
SO6 – Deliver High Quality Distinctive Places (38)
SO7 – Improve Accessibility (39)

Policies

Policy 1 – West Durrington (50)
Policy 2 – Areas of Change (52)
Policy 3 – Providing for a Diverse and Sustainable Economy (73)
Policy 4 – Protecting Employment Opportunities (75)
Policy 5 – The Visitor Economy (77)
Policy 6 – Retail (81)
Policy 7 – Meeting Housing Need (86)
Policy 8 – Getting the Right Mix of Homes (87)
Policy 9 – Existing Housing Stock (88)
Policy 10 – Affordable Housing (90)
Policy 11 – Protecting and Enhancing Recreation and Community Use (93)
Policy 12 – New Infrastructure (94)
Policy 13 – The Natural Environment and Landscape Character (98)
Policy 14 – Green Infrastructure (100)
Policy 15 – Flood Risk and Sustainable Water Management (102)
Policy 16 – Built Environment and Design (104)
Policy 17 – Sustainable Construction (106)
Policy 18 – Sustainable Energy (108)
Policy 19 – Sustainable Travel (110)

Areas of Change

Area of Change 1 – Aquarena (53)
Area of Change 2 – Marine Parade: Stagecoach Site (54)
Area of Change 3 – Grafton Site (55)
Area of Change 4 – Union Place South (57)
Area of Change 5 – Teville Gate (59)
Area of Change 6 – Newland Street Superstore Site (61)
Area of Change 7 – British Gas Site – Lyndhurst Road (62)
Area of Change 8 – Land Adjacent to Martletts Way (63)
Area of Change 9 – The Warren – Hill Barn Lane (65)
Area of Change 10 – The Strand (66)
Area of Change 11 – Northbrook College, Durrington and Broadwater Sites (68)
Area of Change 12 – Decoy Farm (70)