

Worthing Local Plan 2013 – 2033

Your Town - Your Future



**Draft for Consideration at Planning Committee
9th March 2016**

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Foreword - By Executive Member for Regeneration

This consultation is the first step in creating a new Local Plan for Worthing. The Plan, that looks ahead to the year 2033, will be a key document in shaping the future of our borough and will affect us all. I am therefore keen to encourage as many people as possible to get involved.

You may be wondering why we are preparing a new Plan when we've only recently prepared a long term plan to 2026. The current Local Plan, called the Worthing Core Strategy, adopted in 2011 has put us in a strong position - it has helped to steer new building to the places we've planned it and to stop inappropriate development. However, since its adoption central government has changed the planning system which has had many implications for local authorities, particularly in how housing needs are addressed and cross boundary matters are considered.

In response to the new requirements, and to ensure that the Council remains in control of our own Plan, we are committed to getting a new Plan in place as quickly as possible, whilst at the same time allowing for sufficient time for evidence to be updated and for appropriate stages of consultation and engagement.

The Council will continue to plan positively for regeneration and growth and in doing so some difficult decisions will need to be made. Given the limited amount of available land in the Borough and significant environmental constraints it will be vital that the right balance is struck between new development and the need to protect the character and setting of Worthing which we value so greatly.

It is an important time to get involved and tell us what you think. No decisions have been made, this is the first stage in shaping our new Plan. Using evidence, we have identified what we believe to be the key social, environmental and economic issues and opportunities facing the Borough and highlighted these in this document.

Please respond to this consultation – and encourage others to do so too – your responses will be considered and will help us to develop preferred policy options in a draft plan. Your involvement will ensure that we can face the challenges and build on recent successes to make the Borough even better in 2033 than it is now.



CLLR BRYAN TURNER

Introduction

The Council has started work on preparing its new development plan, called the Worthing Local Plan, which will have a big influence on the Borough in the period up to 2033. This consultation provides an opportunity for people to help shape the future of the Borough to meet their needs to create a better place to live, work and play.

The new Plan will provide the strategy for the growth of the Borough, setting out what development will take place and where. It will set out a vision for the area that helps to establish the long term aims and aspirations. The vision will be turned into objectives and policies which will deal with issues such as housing, the economy, the environment and infrastructure. Once adopted, the new Plan will replace the Borough's existing local planning policies and will be an important consideration in deciding planning applications.

Have your say on development in Worthing

This consultation is the first stage in preparing the Plan. Plans can only be truly successful if they are rooted in local knowledge and have an appreciation of what residents want. Too much change, change that is too fast, or not listening to people's views will not deliver a good Plan. Similarly, planning too little development is not an option either, as the plan needs to support growth. Ultimately the Plan will go through independent examination by a planning inspector to make sure it is based on robust evidence and seeks to meet development needs. Not everyone will necessarily get the outcome they want, but making sure your ideas or concerns are understood and considered will help to make the Plan better. This is the first of several chances to have your say.

What is this consultation about?

We are seeking your views and suggestions on how Worthing should grow and develop in the future. This consultation identifies the issues and challenges facing the borough and the options that could help address them. Unlike many other local authority areas spread over wide areas there are only a limited number of development options in and around the town. We are therefore asking your views on how best to balance the delivery of growth and regeneration across the borough to meet future needs whilst at the same time protecting the things we value about the town.

The Council is not, at this stage, stating which sites it will be looking to allocate for development in the new Plan. However, with reference to key evidence, the Council is inviting views on key issues, options and opportunities. The comments that we receive will be given consideration when decisions are made on which sites will be proposed for allocation.

Although the Local Plan will reflect local issues and choices it should be noted that there are also some important limitations as, in line with national policy (particularly the National Planning Policy Framework), the Local Plan must:

- take account of national planning policies and their support for sustainable development;
- be based on an objective assessment of the borough's development needs;
- have regard to the various other strategies of the Council and its partners;
- take into account evidence of environmental constraints on development and the need to conserve the built and natural heritage;
- be supported by a Sustainability Appraisal. This is a legal requirement and is used at different stages to assess the impacts of the Plan.

What comments are we seeking?

The purpose of this consultation is to identify the issues that we should address in the new Plan. Receiving comments at this stage will help us to ensure the Plan sets off in the right direction and covers the things it should cover. It will also help to inform what further evidence is necessary beyond that we have already collected or plan to collect.

To do this, the document identifies a number of issues and asks questions in relation to these issues and associated evidence. There is no requirement for you to comment on every element or to answer every question; we would like you to provide comments on any areas that you have an interest in. Please note it is important to comment on things that you may agree with as well as those you disagree with. It would be helpful if you could ensure that you give an explanation or justification for any comments you make.

Why do we need a new Local Plan?

The Worthing Core Strategy was adopted in 2011 and the intention was that it would help to guide development until 2026. However, it must now be reviewed to reflect latest national policy, particularly with regard to how we now need to plan for housing. Whilst much of the work in the Core Strategy is still relevant the new Plan, to be called a Local Plan rather than a Core Strategy, now needs to look ahead to 2033 and work out the best places for new housing and other growth to go. The Plan must be based on the latest evidence and the national / regional context.

It is a statutory requirement for Council's to have an up-to-date Development Plan in place. Furthermore, without a new Local Plan there is a risk that the Council would lose a degree of local control of planning matters as the likelihood of speculative development proposals would increase.

What will the Local Plan need to do?

In simple terms the new Local Plan needs to balance the benefits of 'growth' against the potential impact of future development and the need to protect the environment. To do this it will need to:

- Aim to meet the objectively assessed development and infrastructure needs
- Identify land where development would be inappropriate
- Contain a clear strategy for enhancing the natural, built and historic environment

The Plan will cover many land uses like homes, businesses, retail, transport, community facilities and green infrastructure. It will contain a Vision for the Borough and a set of associated economic, community and environmental objectives. The Plan will also include new land use allocations where they are needed and policies which will be used to assess planning proposals.

Where will it cover?

The new Local Plan will cover most of Worthing Borough. However, unlike the existing Core Strategy, it will not cover the land in the north of the Borough that lies within the South Downs National Park. The National Park Authority is a planning authority in their own right and they are producing their own Local Plan which will set planning policy for all areas within the South Downs National Park boundary.

In line with the requirements of the duty to co-operate Worthing Borough Council will work with partners and local authorities to consider a range of cross boundary issues.

How does the Local Plan relate to other plans and strategies?

The Worthing Local Plan has to reflect and put into practice a large number of national, regional and local strategies, plans and guidance. At the national level the Local Plan must be in conformity with the National Planning Policy Framework (NPPF) which sets out the government's priorities for planning in England.

Some of the policies in the Local Plan will rely on actions by other parties, so it is important that they are engaged in the process early and agreement reached on who does what. Worthing Borough Council is therefore liaising with relevant bodies that prepare strategies affecting the Borough's future, including health, transport, housing, employment and the environment. This is to ensure that plans and policies are as closely aligned as possible and that strategies support each other.

The Local Plan will also be supportive of the Council's current and emerging priorities and strategies set out in related documents.

Format of this document

The Council has already started collecting and producing the evidence that will inform the preparation of the Local Plan and some of the key issues and challenges identified are highlighted in this document. Whilst comments are invited on all aspects of the new Plan, this document helps to steer the debate by setting out some key questions as to how these challenges may be best addressed. The responses received on these issues will help to influence the subsequent drafting of the Plan.

All engagement and how it has influenced the Plan at each stage will be recorded in the Worthing Local Plan Consultation and Engagement Statement.

DRAFT

Our Borough Now

Overview

The starting point for developing a vision for Worthing is to understand where we are now and how its assets and positive attributes can be used to address the key challenges that are expected to arise over the next 15 years and beyond. Some key facts about the borough and a summary of the challenges that now need to be faced are set out below.

The town, originally developed as a popular Victorian and Edwardian seaside resort, located between the English Channel and the South Downs. It is now one of the largest towns in West Sussex, with around 105,000 residents and a workplace population of approximately 49,000 people. Worthing plays an important role within a wider sub-region with key links to other authority areas such as Brighton & Hove, Adur, Arun, Horsham and Crawley for housing and employment.

Worthing has much to offer its residents, working people and visitors. In recent years the town has seen a resurgence in popularity as young people and families are attracted by the coastal lifestyle. There are a number of greenspaces, parks and gardens within and around the town which are highly valued by residents and visitors. In addition, significant enhancements have been made to the seafront which continues to be an important asset for the town. This is having a positive effect on local businesses and a range of new independent shops and eateries have opened within the town centre.



Key Facts

Community			
Worthing's population has grown 8.6% since 2001	Population growth is largely driven by domestic migration	Most people move to Worthing from Adur or Brighton	25% of the population are aged 65 or over
Number of 1 person households increased 26% from 2001-2011	Average house prices are 7.8 times average earnings	A number of wards ranked in the top 20% most deprived	3% households are living in unsuitable accommodation
In 2014 there were 821 households on the Housing Register	From 2006 - 2015 a total of 2,310 new homes were built	Life expectancy is 7-8 years lower in the most deprived wards	In 2012, 21.1% of adults were classified as obese

Economy			
43% of office space is located in the town centre	72% of the population is economically active	43% of residents commute out of the Borough for work	The visitor economy is worth £170,000,000 a year
Resident wages are higher than Arun and Adur	62% of employment floorspace is industrial	Number of jobs has increased 9.7% from 1997-2015	14% of the working population are self employed
Most jobs are in healthcare, business services, and retail	31.7% of residents have NVQ4 and above qualifications.	Significant job losses in finance and manufacturing	Employment Land Review published XX 2016 (TBC)

Environment			
4 sites of Nature Conservation Interest	360 Listed Buildings	26 Conservation Areas	10,400 properties are at risk of flooding
Bordered by South Downs National Park (SDNP) to the north	Only 8% of land is outside SDNP and Built Up Area	Air Quality Management Area in place	Parts of the Teville Stream are culverted and poor quality.
Bathing water is classed as excellent quality	Worthing is in an area of serious water stress	Worthing includes stretches of undeveloped coastline	(TBC) Worthing Landscape Study published XX 2016

Key Challenges

Although Worthing has seen some key successes in recent years there is still much work to do to ensure that the borough continues to prosper, meets the needs of its residents and better fulfils its role within the wider sub-region.

Whilst there is an aspiration to deliver growth this must be achieved within a very constrained borough. Limited land availability and sensitive areas of countryside around the borough means that there is little room for expansion. The overarching challenge will therefore be the need to balance development and regeneration requirements against the limited physical capacity of Worthing.

A related challenge will be to ensure that development that does come forward delivers the most appropriate mix of uses that responds to existing and future needs. Housing sites will be required to meet a significant demand and the type of housing delivered will need to respond to the demographic changes being experienced. Whilst the need to deliver housing will be a dominant theme other needs such as employment, leisure and community facilities will also need to be carefully considered and balanced as the Local Plan is progressed.

Other key challenges that will run through the Plan will be the need to: help facilitate regeneration; unlock development sites; safeguard key employment land; ensure infrastructure is delivered to support growth; and reduce disparities between the most and least deprived parts of Worthing.

Although the Council will work positively to deliver growth there is no expectation that all needs will be met within, what is, a very constrained Borough. Therefore, it will be imperative that the Council continues to work with neighbouring authorities and partners under the Duty to Co-operate to see whether there is any ability for other areas to deliver some of Worthing's needs.

The vision and objectives that follow are designed to tackle these key challenges. This document then addresses different themes such as the economy, retail and housing. It is accepted that many of the issues identified are interrelated but for the purpose of this consultation they have been drafted in this way to allow for comments to be made on different topics areas.

Vision and Objectives

Vision

The vision will form the critical starting point for the new Local Plan. As such, it is vital that it encompasses the aims and aspirations for the Borough looking to 2033, whilst also ensuring that it is achievable. To help achieve the vision, a series of strategic objectives have been drafted which are also set out below.

The draft vision, and objectives of the Worthing Local Plan have been informed by the existing Core Strategy, the views of elected Members and existing / emerging evidence from various studies and high-level strategies. We are now seeking your views to ensure we are heading in the right direction and the Vision will be refined as options are developed. When finalised, this will become the cornerstone against which the rest of the Local Plan will be prepared.

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

Q1: Vision

- a) Do you agree with the Vision we are aiming and aspiring to achieve?
- b) Does it provide a clear direction to the Worthing Local Plan?
- c) Is there anything you think we have missed which you would like to see incorporated in the Vision?

Strategic Objectives

COMMUNITY

The Local Plan will:

- Deliver a range of high quality new homes that best reflect the identified needs within the Borough (in terms of size, type and tenure)
- Ensure that developments provide an appropriate level of affordable housing to help those in housing need
- Improve accessibility to services, local centres and the town by sustainable modes of transport, reducing the need to travel by car
- Ensure that there is sufficient infrastructure capacity to meet existing needs and the needs arising from new development
- Safeguard family homes and the character and amenity of residential areas
- Ensure new development integrates into existing communities, supporting local centres to enhance well-being of all people, and reduce inequalities

ECONOMY

The Local Plan will:

- Retain and enhance key employment areas and provide a choice of employment sites to meet the needs of existing and future businesses
- Strengthen Worthing's town centre as a location for shopping and business and enhance its role as a sub-regional centre
- Encourage family friendly and evening economies and improve the retail, cultural and leisure offer in the town centre through the improvement of existing areas, the delivery of new developments and improved connectivity
- Enhance the gateway approaches and key transport corridors leading into the town centre
- Support Worthing's tourism role through the provision of additional high quality tourism facilities
- Deliver high quality public realm and enhanced infrastructure to attract inward investment
- Seek to improve the skills of the workforce and quality of the environment to encourage the creation of high value jobs by existing and new businesses

ENVIRONMENT

The Local Plan will:

- Protect, and where possible enhance, valued green spaces, stretches of undeveloped coastline and the quality of the natural environment
- Improve the quality of the natural environment and public realm within the town centre and along the seafront
- Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs
- Protect, maintain and enhance the distinct character, heritage, identity and setting of the Borough
- Ensure development mitigates the impact of, and helps the Borough to adapt to, the effects of climate change, now and in the future
- Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion and promote active travel

Q2: Strategic Objectives

- a) Do you agree with the proposed objectives set out above? If not, what changes would you like to see?
- b) Are the objectives sufficiently distinctive and locally specific?

Key Issues

Economy

A key role of the new Local Plan is to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.

Existing employment land faces continuing pressure from other uses and particularly from higher value like housing. This pressure has been exacerbated by the Government policy to allow some commercial buildings to be converted to new homes.

The Council has started to update key components of its evidence base and an Employment Land Review was published in (TBC). This work has focused on the more traditional employment uses (B class uses¹), however, it does consider, to some extent, the needs of other employment generating uses.

What we know:

Worthing supports a significant amount of employment activity, cultural amenities, educational institutions, retail outlets and visitor attractions. Whilst the focus is on small and medium size businesses there are some large international companies located within the Borough and strong sectors such as health and pharmaceuticals.

Worthing is a net exporter of labour as a proportion of working age residents look outside of the borough for work. The local economy has a significant focus on lower value employment sectors including an above average representation in retail and the public sector. Skills levels are lower than the surrounding authorities and workplace wages are also significantly lower than resident wages suggesting the types of employment roles available locally are less well paid than elsewhere in the sub-region.

Generally, the range of employment sites in Worthing comprises good quality, well maintained stock with low vacancy levels, which demonstrates that much of the existing floorspace is meeting a local market need. The total amount of B class floorspace has been declining with office space decreasing at a greater rate than industrial space.

Levels of new development have been limited over recent years resulting in a growing amount of outdated stock. Demand for office space is expected to grow with a focus on local business needs for small scale, high quality office space in accessible locations. There is a severe shortage of, and strong local demand for, industrial units. Demand for both office and industrial floorspace is mainly from the local market.

¹ B1 Business: offices, research & development, and light industrial; • B2 General Industrial: and
• B8 Storage and Distribution: warehouses, wholesale centres, and distribution centres.

In terms of employment growth the highest growing sectors and key growth drivers over the Plan period are expected to be health, care & social work and professional services. Other growing sectors will be accommodation & food services, pharmaceuticals, transport, storage & distribution and education.

What the Local Plan must do:

- Set out a clear economic vision and strategy which positively and proactively encourage sustainable economic growth.
- Avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of it being used for that purpose.
- Plan for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.
- Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs.
- Support existing business sectors and, where possible, identify and plan for new or emerging sectors to encourage inward investment.
- Include policies that are flexible enough to respond to change.

Key Challenges

- Aim to meet Worthing's employment floorspace needs so that the Borough's economy is not constrained, recognising that developments in adjoining areas will also be a key influence.
- Planning for employment will need to be balanced against pressures from other land uses such as housing, retail and leisure.
- Seek to provide a choice of sites and locations to meet the needs of particular sector and occupier needs.
- Help to improve qualification and skills attainment to better meet the demands of local businesses.

Q3. Economy

- (a) Do you agree with the key challenges identified for the Economy? Are any missing?
- (b) Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?
- (c) In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?

Retail and the Town Centre

What we know

Worthing town centre is the main destination for shopping, leisure and entertainment. Like many towns, Worthing suffered during the economic downturn. However, it did better than most with relatively low levels of vacancy. Despite this, improvements are required to ensure Worthing better fulfils its role within the sub-region.

Town centres are changing - people are using them in different ways, more for leisure and less for day-to-day shopping. The flexibility provided through the rise in online shopping means that retailers can still reach a large proportion of shoppers with fewer stores. The town needs to respond to these changes to remain exciting, relevant and used. It needs to build on its success whilst continuing to adapt and react to change, whilst protecting its valued character.

Worthing has a reasonably successful and resilient hierarchy of retail centres ranging from local parades to the main town centre. These centres are fulfilling their role within the hierarchy and have expanded their range of services and facilities to better meet local needs.

What the Local Plan must do

- Ensure that town centres remain vibrant, diverse and healthy, performing at the heart of communities.
- Reassess the network of centres within the local and sub regional hierarchy.
- Define the extent and role of town centres and primary shopping areas.
- Allocate a range of suitable sites to meet the needs for all town centre uses.
- Promote a competitive, attractive and diverse town centre that provides customer choice and a diverse retail offer and which reflect the individuality of the town.

Key Challenges

- Ensure retail centres meet current and future needs.
- Deliver development at the right time, of the right size and in the right location.
- Create diverse and vital hierarchy of centres to meet changing needs.
- Provide development in the town centre to meet a range of complementary needs.

Q4. Retail and the Town Centre

- a) Have all the key challenges for retail areas and the town centre been identified, if not what has been missed?
- b) Are retail centres functioning well - how can they be improved?
- c) How could new development in the town centre enhance the town's identity and attract more visitors?

Tourism

What we know

The town centre and seafront area is the main focus for tourism in the borough and it is important that the area adapts to meet changing needs. The town needs to provide an attractive cultural and entertainment offer, enhance the night time economy, provide activities for families and ensure that there is a range of visitor accommodation. In essence, the town centre must be a place where more people want to visit and stay for longer. It is also important to build stronger links with the tourism offer outside of the town centre including leisure opportunities along the coast and links to the South Downs National Park.

What the Local Plan must do

- Articulate a vision for tourism.
- Allocate a range of sites to meet the scale and type of tourism and cultural development needed.
- Improve links to the South Downs National Park whilst respecting the character of the countryside.

Key Challenges

- Promoting opportunities for leisure and cultural activities to add vibrancy.
- Build high quality development and public space which enhances the town's identity and historic environment to attract more visitors and businesses.
- Ensure the right mixes of uses are encouraged.

Q5. Tourism

- a) Have the key challenges for tourism been addressed?
- b) In what ways can the tourism offer be improved?

Community and Leisure Facilities

What we know:

Community and leisure facilities are vital to supporting health and wellbeing. The Local Plan has a key role in making sure these facilities are provided and, where appropriate, protected. This is important not only for the quality of life for residents in new developments, but also the quality of life for the existing population. Infrastructure should be designed and provided to meet the needs of people at all stages of their lives, to help bind communities together and help them to lead healthy active lives. This has particular relevance for Worthing with its ageing population and recent influx of young families.

In 2014 an Open Space and Recreation Study showed that areas of open space including the seafront and civic space (non-green) and nature areas are well used by local residents and valued for exercise and social interaction. The Borough also has a wide range of sports facilities. Splashpoint Leisure Centre was opened in 2013 as a new flagship venue, however some other public sport and leisure centres are ageing.

The Worthing Infrastructure Delivery Plan is being updated to identify key items of infrastructure required over the Local Plan period. This will cover a wide range of social infrastructure including health and social care, education, community, housing, sport, faith and culture; in addition to physical and green infrastructure.

What must the Local Plan do:

- Plan positively for the provision and use of community facilities and other local services to enhance the sustainability of communities.
- Guard against the unnecessary loss of valued facilities and services.
- Supporting strong, vibrant and healthy communities.

Key challenges:

- New development may help support existing facilities but they also add pressure on them.
- Identify infrastructure needs of the local community.
- Providing the right range of facilities and services to meet people's needs at all stages of their lives.

Q6. Community and Leisure Facilities

- a) Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing?
- b) Do you have suggestions for how the Local Plan could resolve these?
- c) Are you aware of any particular community and leisure needs?

Transport

What we know:

The planning system places emphasis on the promotion of sustainable travel which can help to reduce traffic congestion, improve health, promote good quality of life and reduce inequalities. Worthing currently has a range of travel options with good rail links along the coast and to London, a frequent bus service and a relatively high level of cycling compared to other towns. However, many of these options compare poorly in cost and journey time to travel by car and transport systems around Worthing are predominantly car focused with poor usability for pedestrians and cyclists.

Road congestion is a key local concern and during peak periods many parts of the network are affected. Particular problems are on main routes into the town (A259 and A24) and along the A27. These issues impact on local air quality and the existing Grove Lodge Air Quality Management Area was extended in 2014 as a result of continued elevated levels. The Council is preparing a draft Air Quality Action Plan which recognises the importance of planning in promoting alternative modes of travel and preventing increases in congestion. Highways England has proposed a Worthing to Lancing A27 improvement scheme that aims to improve the capacity of the stretch of single carriageway in Worthing and the narrow dual carriageway in Lancing. This is being progressed as part of the Highways England Roads Investment Strategy.

A transport study will be undertaken to assess the transport implications of the Local Plan. This will consider the transport implications of growth and identify the mitigation measures required to address congestion and safety issues.

What must the Local Plan do:

- Undertake an assessment of the transport implications.
- Support a pattern of development which facilitates the use of sustainable modes of transport and minimises the need to travel for goods and people.
- Prevents development where the transport impacts, after mitigation, are severe.

Key challenges:

- There are a limited number of sites where sustainable modes are most suited.
- It will be important to ensure that the Local Plan promotes alternative modes of travel and prevents increases in congestion to help tackle local air quality.

Q7. Transport

- a) Do you agree with the main challenges identified? Are any missing?
- b) Do you have any suggestions for how the Local Plan could better promote sustainable transport?

Environment

What we know:

Worthing is bordered by the South Downs National Park to the north and the coast to the south. The majority of the Borough occupies the coastal plain, with the only breaks in an almost continuous band of development along the coast at the far eastern and western ends of Worthing. These gaps in development between Worthing and Sompting and Ferring and Goring maintain the individual identity of settlements and have retained stretches of undeveloped coast. They also contain pockets of grade 1 agricultural land which is considered to be excellent quality. The Council has published a landscape and ecology study to help inform the production of the Local Plan. This highlights the importance of the setting of the National Park, and the character and landscape of the undeveloped coast.

There is a good network of public rights of way. These provide good recreational opportunities as well as wildlife corridors forming a valuable component of green infrastructure. The Borough also contains a number of areas with statutory and non-statutory nature conservation designations. Although most of these are located in the South Downs National Park, there are a number of Sites of Nature Conservation Importance (SNCI) within the Local Plan area.

Its coastal location with excellent quality bathing water is highly valued however parts of the Borough fronting the seafront are at a risk from flooding along with areas associated with the Ferring Rife in the west and Teville Stream in the east. Large areas of Worthing also experience surface water flooding. Adur and Worthing Councils have undertaken a Strategic Flood Risk Assessment to provide evidence to make informed decisions on development. As the Local Plan progresses this study will be updated where required to further inform the appropriateness of any potential sites located in areas at a high risk of flooding.

Rising sea levels and more frequent extreme weather events mean that the occurrence and severity of both flood and drought events are likely to increase as a result of climate change resulting in a wide range of impacts. Worthing is in an area of serious water stress. It is therefore important that the Local Plan supports Worthing's ability to mitigate and adapt to the effects of climate change.

Historic uses, urban drainage and traffic congestion have resulted in air, land and water pollution which pose a risk to both the environment and people's health.

What must the Local Plan do:

- Recognise the intrinsic character and beauty of the countryside.
- Include strategic policies for the conservation and enhancement of the natural environment, including landscape.
- Maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes.
- Direct development to areas of lowest flood risk first / manage any residual risk.
- Allocate development on land of lesser environmental value.
- Take account of climate change over the longer term.
- Plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
- Minimise pollution and other adverse effects on the local/natural environment.

Key challenges:

- Finding the balance between meeting development need whilst maintaining the distinctive character and setting of Worthing.
- Understanding the current and future use and value of undeveloped spaces
- Understanding where development could go ahead and establishing where the environmental impact (even with mitigation) would be inappropriate.
- Ensuring new development protects and seeks to enhance Worthing's important and valued landscape and environment.
- Ensuring that, where opportunities exist, developments create and enhance networks of green infrastructure and result in no net loss of biodiversity.
- Balancing development needs whilst protecting against flood risk.

Q8. Environment

- a) Do you agree with the main environmental challenges identified? Are any missing?
- b) Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
- c) Are there any circumstances you consider where regardless of mitigation development would be inappropriate?
- d) What value do you place on the Borough's green spaces, particularly those around the town?

Housing

Allocating land for housing is a key role of the Local Plan. Worthing will need to grow to meet the needs of an expanding population. The population of the Borough is growing because people are living longer, more children are being born and more people are moving into the town than are leaving. In addition, more people are living on their own than in the past which means even more houses are required to meet housing needs. To help address this, the new Local Plan will need to set housing targets for both market and affordable housing and allocate sufficient land to ensure that these targets can be met. In addition, the Council will need to adopt other housing policies covering, for example, housing mix and density.

The Council has started to update key components of the housing evidence base, including a study which examines the level of housing need in the Borough. This work concludes that the need for new housing is considerably higher than we are currently planning for within the existing Core Strategy. A high level of housing need within the Borough is not new but we are now required to test whether enough sites can be found to meet all of this need. Given the lack of available land within the Borough and significant environmental constraints it is highly unlikely that we will be able to achieve this but it is now the role of the Local Plan review to assess what level of growth we can reasonably and sustainably provide for.

New housing, while helping to meet needs, can also place pressures on existing infrastructure, the environment and natural resources. However, development delivers economic benefits and the opportunity of funding from developers and government to help mitigate those pressures.

What we Know

The way in which the Council needs to Plan for housing has changed. Setting the level of housing to be provided, whilst still based on evidence, is now the responsibility of the local planning authority. The National Planning Policy Framework (NPPF) requires local authorities to undertake housing studies to calculate the Objectively Assessed Need (OAN) of an area. In response to this requirement, and building on previous work, the Council has published the Worthing Housing Study (June 2015). The study takes into account the latest population projections, demographics, household formation rates, economic factors and local dynamics.

The report concludes that the full OAN for housing in the Borough (2013-2033) is 636 dwellings per annum. As summarised in the table below, this is significantly more dwellings than are currently being delivered or that are planned for.

	Total Delivery Requirement	Dwellings Per Annum
Housing requirement previously established in SEP / Core Strategy	4,000 dwellings (2006 - 2026)	200
Housing delivered	2,310 dwellings (2006 - 2015)	257
Objectively Assessed Housing Need (Worthing Housing Study June 2015)	12,720 dwellings (2013 - 2033)	636

It is important to note that this OAN figure represents 'need' in the absence of development constraints – it is not automatically the housing target for the Borough. It is now the role of the Local Plan review to balance housing need alongside other evidence to assess what level of housing can be delivered in a sustainable manner when taking significant environmental and land availability constraints into account.

What the Local Plan Must Do:

- Strike a balance between this clear need for more homes and the impacts that are likely to result from more development. In summary, the Council needs to plan for as many new homes as can be accommodated in a sustainable manner.
- Rigorously and positively assess all opportunities to meet development needs - 'leaving no stone unturned'.
- Consider whether there are overriding constraints locally that mean the Council should plan for a figure below the OAN figure of 636 homes a year. The provision made through the Plan can be different from the OAN but any difference needs to be very well justified.
- Plan for a mix of housing (size, type and tenure) based on current and future demographic trends, market trends and the needs of different groups.

What are the Challenges?

- Balancing the pressing needs for development within a constrained and environmentally sensitive borough with limited development opportunities.
- Where development opportunities do exist there will be a need to consider the needs of different land uses.
- Ensuring that housing developments best respond to the needs of the community, particularly those in need of specialist accommodation.
- Ensuring that development makes the most efficient use of land available by raising densities to maximise housing delivery whilst at the same time ensuring that development is of high quality that respects local character and mitigates any potential impacts.
- Work with neighbouring authorities within the sub-region to consider whether they might have the ability to meet some of the likely shortfall if not enough sites can be found in Worthing to meet the full housing needs.
- Protecting garden land from inappropriate development.

Q9. Housing

- a) Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?
- b) How should we best address specialist housing needs (e.g. affordable housing²; family housing; self-build housing, sheltered & extra care, houses in multiple occupation)?
- c) Efficient use of land will help to raise densities and will contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?
- d) Should the Council include a policy that would resist the inappropriate development of residential gardens?

² As defined by the Government the term 'affordable housing' can include a range of housing types and tenures including social rented, affordable rented, intermediate housing and starter homes.

Development options within the town

All realistic development options in the Borough will need to be tested to assess whether they can contribute towards meeting the identified development needs (housing, retail, leisure, employment etc). In line with Government requirements the starting point in this process is to encourage the effective use of land by reusing sites that have been previously developed (brownfield land).

Housing Land Availability

To understand the capacity of the borough to meet identified housing need the Council is required to assess the amount of land available for housing development and publish the results in a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA is a key component of the evidence base to support the delivery of sufficient land for housing and to inform housing policy within the Worthing Local Plan.

The Council has undertaken a comprehensive review of all sites in the town with the potential to deliver housing. These include all sites that the Council is aware of including those which have been promoted during a 'call for sites'. This consultation provides an opportunity to remind landowners, agents and developer that they can submit sites to the Council at any time that they feel might be appropriate for development.

The SHLAA report (December 2015), which assesses all opportunities on sites that could deliver more than 5 dwellings, concludes that there are currently 14 available, suitable and deliverable sites that could deliver approximately 453 dwellings. It is proposed that the most significant of the opportunities identified in the SHLAA are taken forward as Areas of Change within the new Local Plan (see below). The Council will continue to take a positive view on suitable options to increase housing delivery within the town.

In addition to the sites identified below, further housing will also come from unallocated / unidentified sites within the town - these are known as 'windfalls'.

Areas of Change

Alongside the strategic development at West Durrington (700 homes) the adopted Core Strategy identified twelve Areas of Change which were considered to present the best opportunities to deliver regeneration and help provide for some of the housing, leisure and employment opportunities within the borough. It is proposed that this approach for previously developed sites, which was endorsed at the Core Strategy Examination, is taken forward within the new Local Plan.

Whilst some of the Areas of Change identified in the Core Strategy have now been delivered the appropriate redevelopment of the remainder is still supported by the Council. These sites and two more recent additions are listed in the table below.

All of these sites are previously developed and located within the built-up area of the town. As such, the principle of redevelopment is accepted and appropriate proposals (in accordance with other policies) could be progressed without the need for a formal allocation or for any change in the town's built-up area boundary designation. Development of these sites would help to contribute towards the delivery of housing, employment and leisure needs and will also help to meet wider regeneration objectives.

The table below lists the ten proposed Areas of Change within the town where change is expected and will be promoted over the plan period (further information on most of these can also be found in the Core Strategy and the Council's Annual Monitoring Reports).

	Area of Change	Opportunity	Key Issues
1	Aquarena	To deliver a mixed use development on the land occupied by the former swimming pool to help regenerate the area.	Heritage Flood Risk Design
2	Stagecoach Site, Marine Parade	To deliver a mix of uses on this prominent site - subject to the suitable relocation of the current use.	Heritage Flood Risk Relocation of current use Design / mix of uses
3	Grafton Site	To create a new mixed-use development and improve the public realm/lido and enhance access to the seafront.	Land ownership Access Flood risk
4	Union Place South	To deliver a comprehensive mixed use scheme that will improve connections with the town centre and improve leisure / retail circuits.	Mix of uses Connectivity
5	Teville Gate	To establish a distinctive mixed use gateway site that delivers a range of uses.	Connectivity Contaminated land Design / mix of uses
6	British Gas Site Lyndhurst Rd	To deliver a mix of uses on this centrally located site which is currently occupied by redundant gas holder and depot buildings.	Contaminated land Access
7	Martlets Way	To redevelop the parcels of land, with the key focus on employment uses and an extension to the existing business park.	Land assembly /access Level of employment use Contaminated land
8	Decoy Farm	Represents the most significant opportunity in Worthing to bring forward new employment floorspace (open storage, B1, B2, B8 uses)	Contaminated Land Flood Risk Access
9	HMRC Offices, Barrington Rd	Mixed use redevelopment of parts of the site (following the downsizing of current occupiers)	Level of employment use Layout / access
10	Centenary House	Redevelop parts of the site to provide a mix of uses.	Level of employment use

APPENDIX A



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Q10. Development options within the town

- a) Do you agree that the sites listed above provide the most significant redevelopment and regeneration opportunities to deliver housing, employment and leisure uses within the town?
- b) Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?
- c) Are there any other potential development sites within the current built up area that should be assessed?

Edge of Town Development Opportunities

With the exception of the greenfield development at West Durrington the approach in the Core Strategy was to protect other sites outside the current built-up area boundary and focus development within the town, primarily on previously developed sites. However, given the levels of development needs, identified brownfield sites alone will not be sufficient. The new Local Plan will therefore need to consider all potential opportunities around the Borough and determine whether they can help to contribute towards the delivery of additional housing.

There are very few development opportunities outside the current built up area and all of the realistic options have been promoted by landowners / developers during the 'call for sites' (as they have were during the 2008/9 SHLAA review). Whilst these sites were assessed previously they were not scrutinised in any great detail as the Council could demonstrate to the Core Strategy Inspector that the Borough's needs (as identified in South East Plan) could largely be met within the existing boundary of the town. In this regard, the key difference now is that the higher levels of 'need' (South East Plan vs Objectively Assessed Need) means that there is a need to assess more rigorously all opportunities that lie outside the current built-up area boundary.

As set out in the table below, a total of eight edge of town sites are now being assessed to see whether they have any potential for development. Five of these lie outside the current built-up area boundary and apart from two sites (one in use as a football ground and one as a Caravan Club) all of the others are largely free from development and are considered to be greenfield.

It is important to note that the inclusion of a site in this list in no way indicates the Council's intention to allocate or support development. However, as previously explained, the Council is in a position whereby it must test all potential opportunities to meet identified needs. It will be evidence, which can include consultation responses, that will be used to help determine which (if any) of these sites should be put forward for development in the draft Local Plan to be prepared in the coming months.

A range of evidence will be used to help inform decisions as to whether sites should be allocated for development. A key piece of evidence is the Landscape and Ecology Study (TBC 2016) which reviews the environmental constraints and landscape capacity of sites promoted for development around the borough. Taking landscape, ecological and visual assessments into account the study concludes by setting out the overall suitability for development for each site. These conclusions are summarised in the table below. It should be noted that whilst the Landscape and Ecology study is a very important part of the evidence used to consider the development potential of greenfield sites around the borough it is only part of a suite of evidence that will help to inform the suitability of sites. Other considerations such as infrastructure capacity, transport & accessibility and the comments received during consultation stages will also be important. It will only be when

all of this is in place that the Council will be in a position to weigh up development needs against the capacity for some of these sites to meet some of that need.

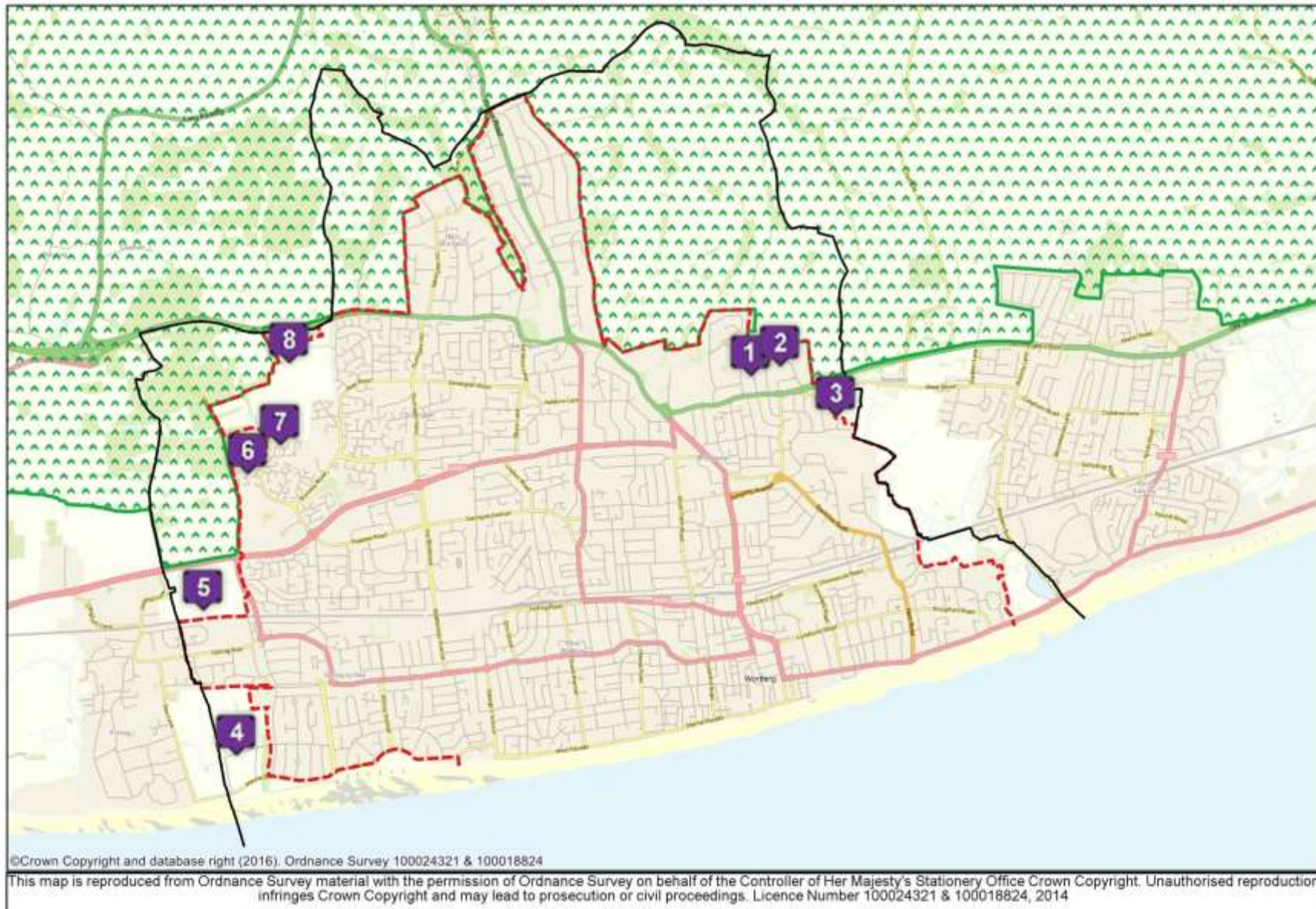
	Site	Site description	Landscape Study findings ³	Key Issues
1	North of Beeches Avenue	2.8ha site located to the northeast of the Borough. Site is bounded on 3 sides by the Built up Area boundary and the South Downs National Park (SDNP) to the north. Currently used as paddock, grazing land and car repairers.	This site could accommodate development due to its generally lower landscape, visual and ecology sensitivity or value.	<ul style="list-style-type: none"> ● SDNP ● Access / A27 ● Air quality ● Relocation of existing business
2	Worthing United FC	1.5ha site located in the north east of the Borough adjacent to the SDNP. Currently used as a football club. Is within the Built Up Area boundary.	This site could accommodate development due to its generally lower landscape, visual and ecology sensitivity or value.	<ul style="list-style-type: none"> ● SDNP ● Access / A27 ● Air quality ● Relocation of football club
3	Upper Brighton Rd	4.4ha site located in the north east of the Borough, in an area of open green space between Worthing and Sompting. The northern part of the site adjoining the A27 is currently in equestrian use.	Splits the site into northern and southern portions. Development on the northern part of the site would have a significant and detrimental effect on the character of the landscape, separation between settlements and/or the setting to the SDNP. The rest of the site is potentially suitable for limited development proposals.	<ul style="list-style-type: none"> ● SDNP ● Access / A27 ● Air quality ● Heritage
4	Goring - Ferring gap	32ha site located in the south west of the Borough which mainly consists of open agricultural land. There are playing fields in the north east part of the site.	Development would have a significant and detrimental effect on the character of the landscape, separation between settlements and/or the setting to the SDNP.	<ul style="list-style-type: none"> ● Coastal setting ● Coalescence ● Heritage ● Amenity space ● Flood risk (part)
5	Chatsmore Farm	28.1ha site located in the west of the Borough, which consists of open/arable land in agricultural use	Development would have a significant and detrimental effect on the character of the landscape, separation between settlements and/or the setting to the SDNP.	<ul style="list-style-type: none"> ● SDNP ● Coalescence ● Agricultural land (Grade 1) ● Flood risk (part)

³ These findings will need to be balanced with all other evidence to determine the suitability of sites for development.

	Site	Site description	Landscape Study findings ⁴	Key Issues
6	Caravan Club, Titnore Way	5.7ha site located in the north west of the Borough, currently leased by the Caravan Club. In use as a caravan site with associated facilities - 79 pitches.	This site could accommodate development due to its generally lower landscape, visual and ecology sensitivity or value.	<ul style="list-style-type: none"> Existing use
7	West of Fulbeck Avenue	0.8ha site located in the north west of the Borough which consists of unmanaged scrub. The site is within the Built Up Area boundary.	Splits the site into northern and southern portions. The northern part of the site is potentially suitable for limited development proposals. The rest of the site is less constrained and could accommodate development without significant detrimental effects on the character of the landscape.	<ul style="list-style-type: none"> Ecology Adjacent SNCI
8	North of West Durrington	9.8ha site located in the north west of the Borough. The site is currently in agricultural use. It sits to the south of the boundary with the SDNP and to the west is the listed Castle Goring. The site lies north of the West Durrington Strategic Development and is within the Built Up Area boundary.	Splits the site into three portions. Development in the west of the site would have a significant and detrimental effect on the character of the landscape, separation between settlements and/or the setting to the SDNP. The central part of the site could accommodate development due to its generally lower sensitivity or value. The east of the site is less constrained and could accommodate development without significant detrimental effects on the character of the landscape.	<ul style="list-style-type: none"> SDNP Heritage

⁴ These findings will need to be balanced with all other evidence to determine the suitability of sites for development.

APPENDIX A



Q11. Edge of Town Development Opportunities

- a) Given the housing needs in the Borough do you have any views as to which of these sites should be developed or protected?
- b) If any of these sites (in full or in part) are to be allocated for development do you have any views on how they should be developed?
- c) If any of these sites are not allocated for development do you have any views on how they should be protected, enhanced or used?
- d) Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?

Planning Policies

The Local Plan is a critical tool in guiding decisions about individual development proposals as its policies are the starting-point for considering whether applications in Worthing can be approved. The Core Strategy currently contains a number of policies and, in addition, there are several saved policies from the Worthing Local Plan (2003). These policies cover a wide range of issues relating to land use. However, in line with prevailing guidance the Core Strategy didn't duplicate policies that were already established at the regional or national level. Since the adoption of the Core Strategy the regional strategy (the South East Plan) has been rescinded and the number of national policies and guidance document has been reduced. This has resulted in a partial policy vacuum at the local level.

The development of a new Local Plan, which will replace all existing local policies, provides the opportunity to bring all policies together in one place. It will also allow for existing policies to be updated and others to be added to ensure that there is an appropriate coverage of policies for Worthing to guide development. Although it is anticipated that the new Local Plan will contain more policies than currently set out in the Core Strategy it will be important to ensure that all policies are locally specific and supported by evidence. Overall, the policies will provide a robust position against which future proposals for development in the Borough can be determined.

List of policies expected to be included in the Local Plan:

Policy	Aim / Intention
Presumption in favour of sustainable development	Presumption established in NPPF which planning authorities are encouraged to incorporate within their Local Plans
Countryside and Coast	Protect the landscape character of the coast, countryside and South Downs National Park (and setting of)
Policies for places	Support growth and change in key areas of Worthing
Quality of the built environment + public realm	Development is of high architectural quality and opportunities are taken to improve the public realm
A strategic approach to the historic environment	Conserve and enhance the historic environment and character of Worthing
The historic environment	Protect designated heritage assets and their settings.
Sustainable design	Require higher water efficiency levels above national standards
Energy	Support standalone energy schemes and require a proportion of energy used in development to be from renewable or low carbon sources
Housing Mix and quality	Ensure an appropriate mix of dwelling types, tenures and sizes that respond to local need and meet national minimum space standards (and where possible standards for accessible/adaptable dwellings)

Affordable housing	Deliver affordable housing to meet identified need
Density	Ensure developments maximise use of available land (whilst also responding to local character)
Gypsies, travellers and travelling showpeople	Establish criteria against which any applications for gypsy travellers / travelling showpeople sites can be assessed against
Protecting and enhancing existing employment sites	Protect and enhance existing employment sites
The visitor economy	Support provision of visitor facilities
Retail hierarchy	Protect and support the growth of the town centres and the hierarchy of local shopping areas
Transport and connectivity	Secure improvements to the transport network / promote sustainable travel
Delivering infrastructure	Ensure development is supported by necessary infrastructure
Green infrastructure	Enhance and improve access to green infrastructure by incorporate elements into developments
Biodiversity	Ensure protection, conservation and, where possible, enhancement of biodiversity
Open space, recreation and leisure	Protect existing facilities and ensure adequate future provision to support growing communities.
Planning for sustainable communities	Protect and support improvements to local social and community facilities
Pollution and contamination	Ensure development does not result in unacceptable levels of pollution
Water quality and protection	Ensure no deterioration and where possible improve surface water and groundwater quality
Flood risk and sustainable drainage	Manage and where possible reduce the current and future risks of flooding
Telecommunications	Establish approach for managing telecommunications development

The draft version of the Local Plan, which will be published for consultation, will include the proposed wording for all these policies. Whilst there will be an opportunity to comment on the full policies in due course we are now seeking your initial views:

Q12. Planning Policies

- a) Do you have any views on how any of these policies should be worded?
- b) Are there any policies missing from the list?
- c) Are all of these policies are required?

Contact / How to get involved

This consultation period on the Local Plan Issues and Options starts on **XX** and ends on **XX**. If you want to comment we encourage you to fill in the **e-form** on our website or email us your comments as they are the quickest and cheapest methods of replying. Alternatively you can send us your comments by post. Responding means we will automatically notify you of future consultation exercises relating to the Local Plan.



Website: XX

Email: XX



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44 Richmond Road
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Any comments received cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act 1998 the personal information you provide will only be used by the Council for the purposes associated with the Worthing Local Plan.

If you do not have access to the internet hard copies of all documents are available to view at the main Council offices and in the libraries throughout the Borough.

What Happens Next?

Following consideration of responses to this consultation, we will proceed to prepare a draft Plan which will be published for two stages of public consultation. The Plan will then be submitted to the Secretary of State and representations will be invited on the Plan's soundness. An independent Examination in Public will then follow to consider the soundness of the document. Subject to the Plan being found sound the Council will then adopt it. These steps are summarised below.

The Local Plan preparation timetable is set out in the Council's Local Development Scheme. Throughout the preparation of the new Plan the Council will continue to work on and publish (on our web site) an updated evidence base.

1	Issues and Options - After this consultation we will analyse all the responses and produce a consultation summary of what we've learnt from what people told us.
2	Preferred Options - We'll test options through sustainability appraisal and assess their deliverability. We'll prepare a preferred options document, showing options for site allocations and new / updated policies. There will be a public consultation on the preferred options followed by a consultation summary.
3	Publication of the Draft Local Plan - Then we will prepare a submission plan and hold a further public consultation on it.
4	Submission and Examination - We'll then submit it and all its associated background evidence and consultation responses for examination by an independent Planning Inspector, who will hold public hearing sessions.
5	Adoption - Once we've received the Inspector's report and if necessary consulted on any recommended changes, we'll adopt the plan as part of our development plan.
6	Monitoring and Implementation - We then monitor to check whether the plan policies and allocated sites are being implemented as planned.