

# Worthing Planning Committee 22 March 2017 Agenda Item no. 7

Ward: Worthing - All

### Worthing Local Plan - Update and Proposed Spatial Strategy

### Report by the Director for the Economy

# 1.0 Summary

- 1.1 A new Local Plan is being prepared to provide the development strategy for the Borough to 2033. Much of the evidence base to inform the Local Plan is now in place and the first stage of consultation was undertaken in summer 2016. This report provides an update on recent progress, a summary of work still required and a revised timetable.
- 1.2 Informed by evidence the report indicates an emerging Spatial Strategy that will form the cornerstone of the Draft Local Plan that will be prepared for consultation later this year. It also proposes an approach to the allocation of sites for development and the protection of other areas.

## 2.0 Background

- 2.1 The Worthing Core Strategy was adopted in 2011 and the intention was that it would help to guide development in the Borough until 2026. However, as explained in previous reports, it must now be reviewed to reflect latest national policy, particularly with regard to how Council's now need to plan for housing. As such, in 2015, the Council committed to replace the Core Strategy with a new Local Plan for the Borough.
- 2.2 The new Local Plan, which will look ahead to 2033, will need 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.
- 2.3 To ensure that the Local Plan is found sound when scrutinised at Examination it must conform to national guidance / legislation and be based on robust evidence. Since the Council committed to this review work has focussed on updating key parts of the Council's evidence base to better understand the needs, opportunities and constraints within the Borough.
- 2.4 The views of interested parties form another key component of the evidence base and the first key stage of consultation (the Issues and Options stage) was undertaken in summer 2016.

#### 3.0 Evidence Base

3.1 Decisions taken within the Local Plan must be based on robust evidence. To ensure that the Council is able to make informed decisions much of the existing evidence has been updated whilst other work is being progressed to ensure that the approach taken forward in the draft Local Plan is one that is founded on the latest information. A brief summary of some key elements is set out below.

# Housing

3.2 The Worthing Housing Study published in June 2015 provides an assessment of the objectively assessed housing needs (OAN) in the Borough. Using demographic projections and population forecasting the study concluded that the full OAN for housing in Worthing in the Plan period up to 2033 is 12,720 dwellings which equates to 636 dwellings per annum. If it were possible to deliver in full, this would represent more than a 20% increase in the number of dwellings in the Borough within a 20 year period. Provision for housing needs in the Plan can be less that the OAN but this is only possible if the Council is able to provide evidence to show how the adverse effects would significantly outweigh the benefits.

## Landscape

3.3 In 2015 the Council's consultant's Hankinson Duckett Associates undertook a Landscape and Ecology Study of eight potential development sites located around the edge of the town. The outcome from that work was reported to Members and helped to inform the Issues & Options consultation document.

- 3.4 Since the publication of the 2015 study, and partly in response to comments received during the consultation, it became apparent that further work was required to ensure that the Council's evidence is robust. The additional 'landscape' assessment comprises the following three elements:
  - ➤ Landscape & ecology assessment on two additional greenfield sites using the same methodology as the 2015 study:
    - Land east of Titnore Road (site 9)
    - Land at Dale Road (site 10)
  - ➤ In response to the very high levels of housing need and the need to test all opportunity sites 'positively' it was felt that a more detailed review of the areas identified in the 2015 study as having 'low' suitability for development should be undertaken. This fine grain analysis will assess the following areas:
    - Site 3B (part of the Upper Brighton Road site)
    - Site 5B (part of Chatsmore Farm site and adjoining land within Arun)
    - Site 8A (part of the North of West Durrington site)
  - Assessment of the suitability of 'Goring Gap' sites for a Local Greenspace Designation. This work will review the criteria for designation and consider this against all relevant evidence, including that submitted by local interest groups to support their application.
- 3.5 The findings from this landscape assessment will, along with other evidence, help to determine the sites / areas which will be taken forward for development within the draft Plan and the sites / areas that should be protected.

### **Employment & the Economy**

3.6	The Local Plan must also plan positively to meet employment needs and help to
	manage the competition between uses. The Worthing Economic Research and
	Employment Land Review (2016) Study concluded that the Council should:

resist the loss of employment space
encourage the intensification of existing sites
allocate new sites for employment use (office and industrial floorspace)
consider if any unmet need can be met elsewhere in the sub-region

### Retail and Town Centre Uses

- 3.7 Initial findings taken from the Council's emerging Retail and Town Centre Study are that the retail hierarchy and town centre are performing relatively well. However, the retail/leisure offer could and should be enhanced to greatly improve Worthing's competitiveness and ensure that less 'spend' is lost to the surrounding areas. The Plan should therefore:

  □ protect and support the existing retail hierarchy
  - ☐ reinforce character areas
  - ☐ take advantage of key opportunities / development sites
  - □ deliver new floorspace Comparison goods (1,000sqm) Comparison goods (9,000sqm)

#### Other Evidence

3.8 Before the Draft Local Plan can be prepared for publication further studies / updates will be required on a range of topics including: transport; flood risk; and leisure. An Infrastructure Delivery Plan will run alongside the main Plan which will also be supported by a Viability Assessment. Ultimately, the Council's Sustainability Appraisal will be used to balance all evidence to ensure that the options being taken forward in the Plan deliver the most appropriate and sustainable development strategy.

## 4.0 Issues and Options Consultation

- 4.1 The Council's Issues and Options consultation document, titled 'Your Town–Your Future' was published in summer 2016. The purpose of the consultation was to invite comments from all interested parties on the challenges that had been identified and the options that could help to address them. Comments received have helped to ensure that the Plan has set off in the right direction and that it will cover the things it needs to cover.
- 4.2 'Traditional' consultation methods were used alongside an increased use of social media. Rather than simply recording the number of responses received the Council was, for the first time, able to quantify the level of engagement and interest through social media. As summarised within the Social Media Report, during the six week consultation period over 5,000 people clicked onto Facebook updates, 300 people interacted with posts on twitter and over 9,000 people viewed the interactive map that supported the consultation document. In total the Council received 261 responses, 20% of which were from groups/organisations.
- 4.3 The consultation report that was circulated to all Members provided a summary of all comments submitted to the Council. In general, there was support for the Vision

and Objectives and agreement with the issues and challenges identified. A recurring theme was the need to protect all greenfield sites until such time that brownfield opportunities had been exhausted. In addition, a number of respondents promoted more sustainable solutions and a 'greener' Plan.

- 4.4 There was overwhelming support to allocate key previously developed sites as 'Areas of Change' because they offered the best opportunity to deliver regeneration and meet wider strategic objectives.
- 4.5 There were underlying concerns about developing on any greenfield sites, however the number comments received on individual opportunities varied significantly. The sites that received few comments or objections were:
  - ☐ Upper Brighton Road
  - ☐ The Caravan Club
- 4.6 The sites receiving few objections and a number of comments in support of development, including an approach that would support their development (in principle) before allocation in the Plan were:
  - □ Fulbeck Avenue
  - ☐ Land north of West Durrington

(Bringing sites forward for development in advance of the Plan is explored in more detail within section 5 below).

- 4.7 A total of 15 representations were received on Beeches Avenue (Worthing Utd Football Club) with strong concern being raised in relation to access, air quality, flood risk and the impact on the South Downs National Park. Some Members may recall that following a Public Inquiry in 2006 an appeal in connection with the construction of 90 dwellings on land to the north of Beaches Avenue (excluding Worthing United's ground) was dismissed.
- 4.8 By far the most comments were received about the two Goring sites (Goring Gap South & Chatsmore Farm). Over 180 respondents (70% of the total) raised strong concerns about any possible development on these gaps. Respondents felt that the gaps must be protected due to: their landscape value; wildlife (particularly birds); flood risk; loss of agricultural land; and lack of infrastructure. Their protection would help to prevent coalescence and would ensure that an accessible natural greenspace was maintained in close proximity to the town. It is interesting to note that the majority of comments addressed both sites with only 4 responses differentiating between them.

# 5.0 Spatial Strategy

- 5.1 The emerging Worthing Local Plan (WLP) must provide a clear direction for development in and around the town which is to say that it must provide an overall spatial strategy. It is very important to get the spatial strategy right as it will influence a number of key policies to be included in the WLP. As such, and informed by evidence to date, it is the right time to start considering the most suitable approach for the Borough.
- 5.2 The strategy must make clear what is intended to happen in Worthing over the life of the plan, where and when this will occur and how it will be delivered. This is done by setting out specific allocations of land for different purposes. A policies map must support the Plan by illustrating geographically where policies will be applied.

#### **National Policy Context**

- 5.3 At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development and this must be reflected in the Worthing Local Plan. This means that the Council should positively seek to meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.
- 5.4 Whilst the Plan must seek and support sustainable growth national guidance also requires that local circumstances to be taken into account including:
  - recognising the intrinsic character of countryside;
  - conserving heritage assets in a manner appropriate to their significance;
  - focussing growth in locations which are, or can be made, sustainable;
  - reusing previously developed land effectively:
  - taking flood risk and coastal change fully into account;
  - delivering adequate infrastructure alongside development; and
  - giving preference to land of lesser environmental value when allocating land.
- 5.5 Therefore, although national planning guidance places a very strong emphasis on meeting development needs this must be balanced against other considerations. Ultimately, this 'balance' can impact on the level of development that can be delivered and this, in turn, will influence the overall spatial strategy.

## The Local Context

- Worthing is a tightly constrained compact town, situated between the South Downs National Park and the sea. There is little scope to grow beyond the current boundary to the east or west without merging with the urban areas of Ferring and Lancing and without damaging the Borough's character and environment. Furthermore, when considering options within the existing built up area there are very few vacant sites or opportunity areas that could deliver significant levels of growth.
- 5.7 As summarised in section 3 above, the Council's evidence base demonstrates that significant levels of development is needed to meet a range of needs, particularly for housing and employment. Whilst the Local Plan must seek to meet these needs it must also take account of constraints and valued assets. To inform these considerations the development strategy is shaped by a range of evidence including:
  - the sub-regional planning context, in particular the Local Strategic Statement;
  - the overall vision and objectives for the Borough;
  - infrastructure capacity;
  - environmental constraints;
  - the views of interested parties
  - the Sustainability Appraisal of options and policies.
- 5.8 The reality is that, when compared to many local authority areas, there are relatively few options for growth to test. It is therefore not surprising that, in many respects, the proposed spatial strategy for the Worthing Local Plan is similar to that adopted in the Core Strategy (2011). This placed a strong emphasis on regeneration and transforming key sites within the urban area.

## **Duty To Co-operate**

5.9 Since the adoption of the Core Strategy there has been an increase in cross boundary work. This has helped to respond to the requirements of the Duty to Cooperate and allow for consideration of where unmet needs might be met. Given the limited opportunities available to accommodate the very high levels of housing need it is inevitable that not all of Worthing's identified needs will be met within the Borough. For this reason, the Council has been working with other local authorities across the sub-region to address strategic priorities (including how objectively assessed development needs can best be met) via the Duty to Co-operate and will continue to do so.

## <u>Spatial Strategy - Core Principles</u>

5.10 The spatial strategy outlined below seeks to achieve a balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is to provide a clear direction that will maximise appropriate development on brownfield land while adding sustainable greenfield urban extensions adjacent to the existing urban area. Ultimately, this approach will help to steer new development to the right locations whilst helping to protect those areas of greatest value / sensitivity.

# **Regenerate Key Sites**

To help deliver housing and employment opportunities and bring forward brownfield sites 'Areas of Change' will be allocated. These development areas are already well served by sustainable transport and infrastructure and present the best opportunity to deliver positive change and renewal within the built-up area boundary. Particular emphasis has been placed on seeking to address issues within wards with higher levels of deprivation and the regeneration of key sites in the town centre / seafront. The redevelopment of these is critical to the overall delivery of housing and employment growth over the Plan period.

# **Optimise the Potential of other Brownfield Sites**

The Government encourages using land effectively by reusing sites that have been previously developed. In response to this, all sites within the Borough that have development potential have been positively assessed. The Plan encourages development to come forward on suitable brownfield sites (through, for example, conversions, redevelopment and changes of use). As land is limited it is vitally important to develop it efficiently. The density of development should be appropriate for its proposed use and also relate well to the surrounding uses and the character of the area. To balance the impact of growth the strategy also seeks to ensure that key employment sites are safeguarded and improved, or replaced with an enhanced facility.

## Positively Reviewing Edge Of Town development Sites

Given the levels of development needed and the requirement to plan positively to meet housing needs, brownfield sites alone are not sufficient. The Plan has therefore assessed the potential for development from all possible sources. This includes all edge of town opportunities around the Borough (including greenfield sites) that could contribute towards the meeting these needs. Evidence which demonstrates that specific sites are sustainable, deliverable and viable has informed the decision to allocate X (TBC) edge of town sites for development in the

Plan. The proximity of these development sites adjacent to existing urban areas will allow for integration with existing communities and access to nearby facilities, services, and public transport.

# **Protect Valued Open Space and Landscapes and Avoid Coalescence**

All edge of town sites have been positively tested to see if they could accommodate development. However, when considering these options the Council must also recognise environmental constraints. Consistent with the NPPF, the spatial strategy seeks to avoid adverse impacts on those areas where development should be restricted. The spatial strategy therefore seeks to manage the pattern of development and prevent settlement coalescence through the use of the Built Up Area Boundary and countryside / gap designations. This will help to ensure that development is sustainably located, that the most valued and sensitive landscapes (including the coastline) are protected and that the existing character of Worthing is maintained. As the population density of Worthing increases, the demand for and use of parks and open spaces throughout the borough will increase. The Plan therefore seeks to protect and enhance these assets and promote health and well-being in our communities.

### Site Allocations

5.11	To help deliver the Spatial Strategy and meet development needs the Local Plan
	will include policies that will encourage the appropriate development of brownfield
	sites. In addition, the Plan will allocate a number key of sites for development.
	These are split into two types:

Areas of Change (AOCs) - these are the key regeneration (p	oreviously
developed) sites within the existing built up area boundary	
Edge of Town Allocations (ETAs) - these include greenfield sites	and sites
that were previously located outside the built-up area boundary	

5.12 Development of these sites must contribute towards meeting the Vision and Strategic Objectives identified in the Plan. Delivery as proposed will contribute towards the delivery of the housing and employment needed within the borough and will also help to address wider community infrastructure needs.

5.13	For	each site the Local Plan will sets out:
		a description of the site;
		the challenges that would need to be addressed;
		potential solutions to these challenges and;
		site specific development principles (including proposed uses) that must be

#### addressed.

## Areas of Change

5.14 At this stage it is considered that the draft Local Plan would allocate the following 12 sites as Areas of Change (the list may change depending on emerging evidence and discussions with landowners). All of these sites are previously developed and located within the built-up boundary of the town. They are sites where changes are expected and promoted and which provide the best opportunities to meet regeneration objectives. Work to deliver some of these opportunities has gathered pace in recent times and their regeneration continues to be a corporate priority that also achieves support across the sub-region.

AOC1	Aquarena	AOC7	Martlets Way
AOC2	Stagecoach, Marine Parade	AOC8	Decoy Farm
AOC3	Grafton Site	AOC9	HMRC Offices, Barrington Rd
AOC4	Union Place South	AOC10	Centenary House
AOC5	Teville Gate	AOC11	Town Hall Car Park , Stoke Abbott Rd
AOC6	British Gas Site, Lyndhurst Rd	AOC12	Columbia House

## Edge of Town Sites

- 5.15 Given that brownfield sites alone will not be sufficient to meet development needs to 2033 all potential opportunities around the Borough were considered 8 sites were tested in the Landscape Assessment (2015) and then included as potential development opportunities within the Issues and Options consultation document.
- 5.16 The evidence collected to date provides a good initial understanding of which sites the Council may need to protect from development and which might be suitable to help contribute towards meeting, at least, part of the Council's future housing need. The landscape study findings therefore provide a clear steer as to which sites warrant further testing. The table below reflects the likely way forward for each edge of town opportunity. However, it is important to note that the proposed designation/allocation of sites within the Draft Local Plan will only be determined once further evidence has been gathered, particularly in relation to such issues as transport, flood risk and an infrastructure capacity review.

## Edge of Town Opportunities – Likely Way Forward

Protect	- Goring - Ferring Gap (South)
Protect / Test (test potential for development in south west corner of site).	- Chatsmore Farm
Potential allocations (Subject to further testing)	<ul><li>Beeches Avenue (Worthing Utd)</li><li>Upper Brighton Road</li><li>Caravan Club (part)</li></ul>
Allocations (Consider bringing forward in advance of the Local Plan – see paragraph 5.23 below).	<ul> <li>Land North of West Durrington</li> <li>Land at Fulbeck Avenue</li> </ul>
'New' sites – Further testing required	<ul><li>Land at Dale Road</li><li>Land East of Titnore Lane</li></ul>

5.17 Informed by existing and emerging evidence, Officers will draft policies for inclusion in the Draft Local Plan. Site allocations, that will be used to designate sites for development, will establish key development principles including likely development yield and the appropriate mix of uses. The Plan must also clarify what form of designation will be used to protect the edge of town sites that evidence has demonstrated are not appropriate for development. Work will be undertaken to establish the most appropriate form of designation and use for these sites and consideration will be given to a range of options including 'countryside', 'gap' and 'Local Green Space' policies.

### **Development Capacity**

- 5.18 The Local Plan must establish the development targets for the Borough. As explained above, using evidence, these will reflect:
  - demographic projections and the likely future population;
  - the amount of land available for new homes and business:
  - the need to provide for a variety and mix of homes;
  - the need to deliver new and improved sites to meet the needs of new and existing businesses;
  - the capacity of infrastructure to meet existing and future needs;
  - the need to provide land for other essential uses (e.g. open space and community facilities);
  - and the need to respect the historic, built and natural environment of the town.

- 5.19 Officers have undertaken an initial capacity assessment which has been informed by the emerging spatial strategy and the sites that, at this stage, are considered to be likely to be allocated for development. This 'evidence-led' work has demonstrated that a realistic housing capacity figure for the Borough from 2016 to 2033 could be approximately 4,700 dwellings. This equates to approximately 280 dwellings per annum which is a delivery rate 40% higher than previously planned for within the Worthing Core Strategy.
- 5.20 Whilst the indicative capacity figures set out above are liable to change as the Plan progresses, it is abundantly clear that, despite taking a positive approach to development, the likely delivery rate for housing will fall significantly below the Objectively Assessed Need. This work indicates that, using the current assumptions, approximately 46% of the overall housing need will be met and that this would result in a shortfall in housing delivery over the Plan period of 6,900 dwellings.
- 5.21 The Plan will need to consider the consequences of this level of shortfall and the impacts that this will have on the local housing market and the wider economy. Furthermore, this level of unmet need places even greater importance on Duty to Co-operate considerations. It will be vital that the Council continues to work with other local authorities within the sub-region to address strategic matters.

## Consideration of Edge of Town sites within the Built Up Area Boundary

- 5.22 Two of the edge of town opportunities (Fulbeck Avenue and Land north of West Durrington) are already located within the existing built up area and, in many respects, have been previously tested as part of the wider strategic development at West Durrington. The landscape study concluded that parts of these sites had medium and high potential to deliver new development.
- 5.23 Given the above, the following question was asked within the Issues and Options consultation document: '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?' As reported above, most of the respondents that replied to this question either agreed or raised no objection to this suggestion.
- 5.24 Against the backdrop of significant and growing housing need the Council must, where possible, continue to take positive steps to bring forward sustainable opportunities to deliver new development. In response to existing evidence and the general support for this approach expressed during the consultation, it is felt that

the Council should take a positive view on these two sites coming forward for development in advance of the adoption of the new Local Plan. Again, given the existing evidence and the location of the sites within the built up area, it is not felt that this approach would set an undesirable precedent.

5.25 If the Council does indicate broad support for the presumption of development on these sites, would still require a robust consideration of all issues relevant to the determination of any similar planning application. This will be principally relevant to the consideration of proposals for the western part of the land north of West Durrington site which evidence has shown to be particularly sensitive.

# 6.0 Next Steps and Revised Timetable

- 6.1 As explained in Section 3 above, the Council will continue to progress a range of evidence to inform the Draft Local Plan. This will include the testing of all options through a transport model and the Sustainability Appraisal. This, along with liaison with landowners / developers, will help to inform the sites that will be taken forward to reflect the proposed Spatial Strategy. The Council will also need to respond to any changes to planning guidance / legislation and reflect the proposed direction set out in the Housing White Paper.
- As Members will be aware, the hearing sessions for the public examination of the Adur Local Plan have just ended. The issues addressed during the hearings and, ultimately, the Inspector's findings will provide Worthing Borough Council with a clear steer as to how challenges should be addressed within the Worthing Local Plan. Much of the evidence used to inform the Adur Local Plan follows the same methodology as that being applied in Worthing. In this regard, it is reassuring to note that this was largely unchallenged during the Examination and in some instances was given an early (informal) endorsement by the Inspector.
- 6.3 To ensure that the timetable for the progression of the Local Plan is realistic and upto-date the Council's Local Development Scheme (LDS) has been revised. The revised LDS (attached as Appendix A) is a public 'project plan' that establishes a three year work. This version of the LDS, when adopted, will cover the period 2017-2019 and will supersede the previous version published by the Council in 2015.
- 6.4 The LDS sets out the programme for the production of the new Local Plan, including key milestones and information on when people will have an opportunity to be involved in the process. The timetable indicates that the Draft Local Plan will be published for consultation later this year before the submission version of the

Plan is prepared for Examination in 2018. Ultimately, it is hoped that the Council will be in a position to adopt the new Worthing Local Plan early in 2019.

6.5 A version of this report was considered by the Joint Overview and Scrutiny Committee on 16<sup>th</sup> March. A verbal update of any relevant discussion arising from that meeting will be provided by officers.

# 7.0 Legal

7.1 The Worthing Local Plan will be prepared in accordance with the Planning and Compulsory Act 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Localism Act 2011.

# 8.0 Financial implications

8.1 There are some significant, costs attached to the progression of a new Local Plan. Most of these costs relate to the evidence base required to make informed decisions within the Plan but there are also costs associated with consultation stages and the Examination. The production of the Local Plan, as timetabled in the Local Development Scheme, is to be funded by the existing service budget.

#### 9.0 Recommendation

- 9.1 The Planning Committee is recommended to consider the Officer's report and decide what comments, if any, it wishes make prior to consideration by the Joint Strategic Committee (4<sup>th</sup> April 2017). In particular, comments are invited on:
  - a) The emerging Spatial Strategy based on the currently available evidence;
  - b) The principle of supporting development coming forward on the two edge of town sites that lie within the existing built up area in advance of the Local Plan and;
  - c) The timetable for the progression of the Worthing Local Plan set out in the revised Local Development Scheme (Appendix A).

### **Local Government Act 1972 Background Papers:**

Worthing Local Plan Issues & Options Consultation Document (and associated reports)
Local Development Scheme 2017 (Appendix A)
Worthing Core Strategy 2011
Platforms for Our Places

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#### **Schedule of Other Matters**

## 1.0 Council Priority

1.1 'Platforms for Our Places' in particular, Our Financial Economies

#### 2.0 Specific Action Plans

- 2.1 Establish an up to date planning framework for Adur and Worthing to prioritise areas for growth and provide a clear platform for the future growth and development of our places and the protection of key environmental assets.
- 2.2 An adopted planning framework will also help to underpin a clear regulatory service for development management, help facilitate business growth and meet future housing and community needs.
- 2.3 The timetable for the progression of a new Local Plan is set out in the Council's revised Local Development Scheme 2017 (Appendix A)

# 3.0 Sustainability Issues

3.1 The Government requires that all Development Plan Documents (including Local Plans) be subject to a formal sustainability appraisal. The Local Plan will aim to promote sustainable development.

# 4.0 Equality Issues

4.1 The Plan will be the subject of an Equalities Impact Assessment. It will aim to ensure that all groups in Worthing have equal access to the spatial opportunities offered by the new Development Plan. For example, the provision of affordable housing and sustainable transport initiatives are key issues to be addressed through the new plan to help promote equal opportunities.

#### 5.0 Community Safety Issues (Section 17)

5.1 The new Local Plan will consider community safety issues.

#### 6.0 Human Rights Issues

6.1 Matter considered – no specific issues identified.

## 7.0 Reputation

7.1 The delivery of a new Local Plan will meet the spatial needs of the Borough and therefore have a positive impact on the reputation of the Council.

#### 8.0 Consultations

- 8.1 Formal and informal stages of consultation with the public and all relevant stakeholders are integral to the development of a new Local Plan. As a minimum, consultation will be undertaken in line with the Joint Adur and Worthing Statement of Community Involvement (Dec 2012).
- 8.2 Members of the Council (particularly the Local Plan Member Working Group) will be involved in the progression of the new Local Plan at all appropriate stages.

#### 9.0 Risk Assessment

- 9.1 There is a statutory duty on the Council to produce an up-to-date Development Plan.

  Failure to meet the milestones as set out in the Council's Local Development Scheme could impact on a number of this Council's priorities including economic and social regeneration as well as the delivery of affordable housing.
- 9.2 Failure to get a new Development Plan in place in a timely manner may impact on local control when determining applications and increase the risk of speculative development proposals.

#### 10.0 Health & Safety Issues

10.1 Matter considered and no issues identified.

#### 11.0 Procurement Strategy

11.1 Matter considered and no issues identified

### 12.0 Partnership Working

- 12.1 The Government's Duty to Co-operate places a requirement on Local Planning Authorities to work with neighbouring authorities to address strategic issues. Work to address this need is on-going and will continue as the Plan is advanced.
- 12.2 Given that the Local Plan for Adur District Council is well advanced, officers will consider best practice and elements/policies in that Plan that will also be relevant to the new Worthing Local Plan. Where appropriate, evidence studies will be procured jointly with Adur DC and other neighbouring planning authorities.