

**WORTHING  
BOROUGH  
COUNCIL**

**DRAFT  
LOCAL PLAN  
2016 - 2033**

**REGULATION 18**

**MARCH 2019**



**SUMMARY OF  
REPRESENTATIONS REPORT**



**WORTHING BOROUGH  
COUNCIL**

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# SUMMARY OF REPRESENTATIONS

## Introduction

This report summarises the representations received during the Draft Worthing Local Plan (Regulation 18) consultation. This summary is not designed to report on all comments made - the intention is that it draws out the key points and provides an early indication as to how, where relevant, they will be addressed as the Council prepares the Submission version of the Plan in the coming months. All responses to the consultation are available to view in full on the Council's website and as hard copies in the Council Offices (Portland House, Richmond Road, Worthing). This summary should be read in conjunction with the 'Consultation Report' which gives an overview of the consultation methods used. Where appropriate, the respondent's individual reference number is provided - these are either 'E' numbers (submitted using e-form) or 'M' numbers (submitted 'manually').

## GENERAL COMMENTS

A number of representations made comments that covered multiple sections of the Plan. This included:

- Support for the inclusion of social issues and for the strong environmental focus
- Highlighting the needs of all sectors of society
- Concerns were raised about the plans to locate extra beach huts along the seafront. (It should be noted that this proposal is not included in the Draft Worthing Local Plan).
- Concerns were raised that the Plan period is not consistent with national policy.

**Officer Response:** *The plan period will need to be amended so that it extends to 15 years from date of adoption. An assessment of the implications of this change (for the Plan and supporting evidence) will be undertaken.*

## PART I - INTRODUCTION

### VISION & STRATEGIC OBJECTIVES

A number of representations supported the Vision and individual Strategic Objectives. In addition, specific comments were proposed to strengthen the Vision and additional Strategic Objectives.

**Officer Response:** *The Vision and Strategic Objectives will be largely retained as drafted but an assessment will be made to consider if minor amendments would help to strengthen these.*

## PART 2 - SPATIAL STRATEGY

### POLICY SP1 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

One respondent argued that this policy is unnecessary and duplicates national policy.

**Officer Response:** *The inclusion of this policy helps to integrate the NPPF at the local level and local planning authorities are advised to include this within their Local Plan (as is the case within the recently adopted Adur Local Plan). Therefore, no significant change will be made.*

### POLICY SP2 - SPATIAL STRATEGY

A variety of comments were made in relation to the proposed spatial strategy (many of which are also covered in other sections of the Plan). Whilst the very constrained nature of Worthing was broadly acknowledged several representations suggested the Council should be doing more to meet its housing need. In particular, several representations raised concerns that the focus/emphasis of this policy should be on maximising delivery to meet needs rather than its current focus on protection. Other key comments included:

- Support for the redevelopment of brownfield / urban sites
- Support for the overarching strategy and the protection of valued open spaces/landscape
- Some opposition to any greenfield development (particularly before all brownfield sites have been developed)
- Concerns raised about the impact of development on infrastructure including roads, car parks (due to loss from redevelopment), schools and health services.

**Officer Response:** *Given the lack of alternative options, the Spatial Strategy will remain largely unchanged. However, as explained elsewhere, further work will be undertaken to ensure that all opportunities that could help meet development needs are fully explored and optimised. An Infrastructure Delivery Plan is being progressed alongside the Local Plan to help ensure that infrastructure needs arising from new development are met.*

### POLICY SP3 - DEVELOPMENT SITES

Comments submitted in relation to the proposed development sites are also addressed within SP2 (Spatial Strategy) above and within the sections relating to the individual sites below. In addition, the following more generic comments were made in relation to SP3:

- The Plan does not meet housing needs and that it should seek to reduce the shortfall as far as possible and identify how any shortfall will be met
- Arun District Council (M56) has objected due to the significant unmet need that is unresolved through the Plan. This is also highlighted by Horsham District Council (M69)

- Representations from neighbouring authorities highlighted the work being done under Duty to Cooperate and towards the preparation of Local Strategic Statement 3 (LSS3)
- Brighton & Hove City Council (M89) state that it would be helpful to clarify how much additional office and industrial floorspace will be delivered at Decoy Farm to meet the forecast needs
- Persimmon Homes (M102) - argue that Chatsmore Farm should be included as an allocation. They highlight the complexity applying to many of the allocated sites and that the housing contribution from the Areas of Change cannot be relied upon.

**Officer Response:** WBC will continue to work with authorities within the sub-region to assess how housing needs can be met. In particular, work will focus on the progression of LSS3. The Strategic Planning Board has recently agreed to sign up to a Statement of Common Ground that will commit the relevant authorities to the production and progression of LSS3 and the necessary background evidence.

#### POLICY SP4 - COUNTRYSIDE AND UNDEVELOPED COAST

Several respondents supported all, or part, of the policy. However, one representation argued that the blanket protection for countryside pockets outside the national park is not justified and that no particular need for countryside uses within Worthing has been demonstrated. Additional comments:

- Representations supported the protection of the natural coastline, its associated vistas and access to views
- 4 representations from organisations supported part f) of the policy relating to the setting of the South Downs National Park and the Designated International Dark Skies Reserve
- West Sussex Access Forum (E43) - Support of Criterion d) and e). The lack of multi-use PRoW on Coastal Plain is widely accepted and improvements and enhancements would be beneficial.

**Officer Response:** Consideration will be given to all pockets of land located outside the proposed built up area boundary to ensure that their future use and designation is clarified.

#### POLICY SP5 - LOCAL GREEN GAPS

There was very strong support for this policy - 102 representations (including 7 organisations). Key reasons given in support were that the gaps provide an important break between development. They have multiple functions and have an important role for wildlife, biodiversity, landscape, health & wellbeing, recreation. The vast majority of representations on this policy were also linked to the proposed Local Green Space designation so this summary should be read in conjunction with policy SP6 below.

A much smaller number of representations question the policy approach:

- Review approach given the significant shortfall in housing (Horsham DC - M69)

- Policy is in effect creating a green belt which is not consistent with national policy (HBF - M79)
- Object to the Chatsmore Farm and Goring-Ferring Gap designations because of the Plan's significant housing shortfall (Persimmon Homes - M102).

**Officer Response:** *Although the Council acknowledges the significant levels of unmet housing need this does not automatically override the need to protect sensitive environments. The draft Plan explained the balance that had been struck and how this was supported by robust evidence. This will be further reviewed and, where appropriate, updated in light of the comments received during the consultation.*

## POLICY SP6 - LOCAL GREEN SPACE

There was very strong support for this policy with 136 representations opposing development in these areas and / or supporting 'protection' of both the Goring gaps (and to a lesser extent Brooklands). Of these, 100 representations made specific reference to their support for policy SP6 (see also policy SP5 above).

Much like the comments received at Issues and Options stage, the key reasons given why the Goring sites should be protected from development include: impact on biodiversity, wildlife (birds) / the loss of land used for informal recreation that supports health and well-being / impact on landscape, views and setting of SDNP / the need to protect settlement pattern & avoid coalescence / loss of agricultural land / the need to protect undeveloped coast / historic associations / infrastructure concerns / flood risk / and the value of the Ilex Avenue bridleway.

- Ferring Conservation Group (E18) - in the revision of the Ferring Neighbourhood Plan we shall, be pressing for Local Green Space Designation on the southern gap land that lies within Arun
- SDNP Authority (M66) - the Chatsmore Farm site is of significant importance in maintaining the views from the SDNP of the coastal plain and for the separation of settlements. Proposed designation and justification in the supporting text is strongly supported
- Southern Water (M74) - Suggest boundary amendment to Policy Map to exclude a parcel of land at Brooklands that forms the northernmost tip of East Worthing Wastewater Treatment Works.

Although the vast majority of representations made in relation to this policy were supportive of the Council's proposed approach there were several that raised concerns, particularly relating to the proposed designations and the significant shortfall in housing. Importantly, these included representations submitted by the landowner(s):

- Persimmon Homes (M102) - designation of the privately owned Chatsmore Farm and Goring-Ferring Gap as LGS would be inappropriate and unduly restrictive given that the sites are extensive tracts of farmland and they do not have qualities which are demonstrably special. The approach is not consistent with that taken by Arun DC.
- Sylvatica Homes (M71) - land does not meet the requirements for LGS and the 2 acre parcel of land within the southern part of the site should be removed from this

designation. There are lots of options other than housing that could help tourism / regeneration.

- House Builders Federation (M79) - these are extensive tracts of land so their designation is inconsistent with paragraph 100 of the NPPF and should be deleted.

**Officer Response:** *Although the Council acknowledges the significant levels of unmet housing need this does not automatically override the need to protect sensitive environments. The draft Plan explained the balance that had been struck and how this was supported by robust evidence. This will be further reviewed and, where appropriate, updated in light of the comments received during the consultation.*

## PART 3 - SITES

### SITES - INTRODUCTION & DEVELOPMENT PRINCIPLES

A number of organisations made comments that related to all development opportunities. These included:

- West Sussex Access Forum (E43) - where appropriate, proposals for development should include NMU access and link to the wider access network
- WBC Sustainability (M110) - recommends specific requirements for town centre sites including climate change adaptation. Also suggest that allocations for decentralised energy are added
- Southern Water (M74) - where appropriate the reinforcement of the local sewerage network would be required to accommodate proposed development and easements. In addition, underground infrastructure may cross the site which will need to be taken into account
- Soctia Gas Networks Ltd (M147) - reinforcement of grid will be required in the medium term if gas is to play a major role in meeting the energy requirements of developments. Extent of improvements will become clear once a developer's request has been received
- Sussex Wildlife Trust (M86) - it is unclear what weight will be given to 'site requirements'. There is no requirement to integrate biodiversity within the development (para 175d of the NPPF). The policy should include the following wording:
  - This development should be informed by up to date ecological information
  - Biodiversity net gains and high quality Green Infrastructure should be achieved by any development on the site.

**Officer Response:** *Where appropriate, the development principles will be amended / strengthened.*



## SITES - PROPOSED ALLOCATIONS

### AI - CARAVAN CLUB

Five objections/concerns including 4 from organisations. Areas of concern include: loss of visitor accommodation; potential impact on Local Wildlife Site / ancient woodland / biodiversity / tranquility / SDNP / local highways.

**Officer Response:** *It is expected that the allocation will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received during the consultation.*

### A2 - LAND WEST OF FULBECK AVENUE

Six objections / concerns from organisations. Natural England (M83) and Sussex Wildlife Trust (M86) note part of the site is a priority habitat which should be retained, that it forms a buffer to the SDNP and is functionally linked with the adjacent Local Wildlife Site. West Sussex County Council (M152) have raised concerns as to the suitability of this site for development due to the level of surface water flood risk and the role this site plays in reducing flood risk downstream. Other concerns: phasing and design re sewerage and underground infrastructure / impacts on Local Wildlife Site / biodiversity / increased traffic.

**Officer Response:** *It is acknowledged that the SFRA needs updating to provide a Level 1 assessment and Level 2 assessment for those sites that require the Exceptions Test. This will include those sites at risk from other sources of flooding and will also need to consider cumulative impact as required by the NPPF.*

### A3 - UPPER BRIGHTON ROAD

Ten representations received (8 from organisations). Some concerns were raised relating to access arrangements and local congestion. Specific comments include:

- Historic England (M67) - should include a requirement to protect the setting of both the listed building and the conservation area
- Adur DC (M69) - request that careful attention is paid to avoidance of coalescence, landscape matters, transport movement and potential impact on the Sompting Village Conservation Area
- SDNP Authority (M66) - as site is visually sensitive in views from the SDNP the design of any development must be informed by the landscape character
- Persimmon Homes (102b) welcome and support the proposed allocation and envisage development implementation and completion within a 2-3 year timescale
- Strutt and Parker on behalf Sompting Estates (M87) - it is difficult to see from Figure 2 exactly where the boundary to A3 and the boundary to the Local Green Gap area lies. Boundaries should be adjusted to reflect the revised easement arrangements that have been agreed with Rampion. The easement strips will not be suitable for tree planting so reference to “a block of woodland planting within the eastern area” should be deleted.



Provision should be made for the maintenance and improvement of suitable agricultural access alongside the land use changes.

**Officer Response:** *Wording relating to the avoidance of coalescence and the need to protect heritage assets will be strengthened. Maps will be amended to clarify the boundary of the Local Green Gap and to revise the extent the required easement strip. It will also be clarified that the easement strip is not suitable for tree planting.*

#### A4 - DECOY FARM

Nine representations (8 from organisations) which were generally supportive about the proposed development. The following points were made:

- Careful regard needs to be had to potential impact of development on the Worthing - Sompting Local Green Gap and the proposed footpath / cycleway (Adur DC - M69)
- Specific amendments suggested relating to contaminated land and restoration of Teville Stream made by Environment Agency (M63)
- Wording suggestions made by WBC Sustainability (M110)
- Sompting Estate owns the land to the east that sits within the Local Green Gap and has declared its willingness to cooperate over the delivery of routes that improve access to the countryside.

**Officer Response:** *It is expected that the allocation will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received during the consultation.*

#### A5 - TEVILLE GATE

Seven representations (5 from organisations) were generally supportive of the regeneration of this site. Specific comments were made relating to: surface water flooding; contaminated land and remediation; biodiversity; alternative uses; and the potential impact on the setting of the Listed Grand Victorian Hotel and the original Worthing Railway Station.

**Officer Response:** *It is expected that the allocation will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received during the consultation.*

#### A6 - UNION PLACE

Six representations received (5 from organisations). Minor changes were suggested to help improve the sustainability of the development. One representation questioned the proposed mix of uses and the need for any additional retail.

- WBC Major Projects Team and & LCR (M80) request change to boundary to include surface car-park to west for subsequent phase of development. The indicative capacity

should be amended to 200 residential units and approximately 9,500 sqm retail/leisure. The policy should be revised to exclude reference to right of light and electricity sub-station

- Historic England (M67) revise to clearly identify the listed buildings facing this site.

**Officer Response:** *It is expected that the allocation will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received during the consultation. This is likely to include revisions to the site boundary and the indicative capacity.*

## A7 - GRAFTON

Five representations received (4 from organisations). One representation raised concern about loss of parking and the bowling alley. Another highlighted the sensitive setting of the site and the potential impact on the seafront.

- Environment Agency (M63) state that the criteria should specify the need for a site specific flood risk assessment prior to the site being developed
- Southern Water (M74) require site layout to allow 15m gap between pumping station and sensitive development (e.g. housing) if relocation of infrastructure is not feasible.

**Officer Response:** *It is expected that the allocation will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received during the consultation. It is acknowledged that the SFRA needs updating to provide a Level 1 assessment and Level 2 assessment for those sites that require the Exceptions Test.*

## A8 - CIVIC CENTRE CAR PARK

Four representations received (3 from organisations). Whilst one representation raised concerns about the loss of parking the others were generally supportive:

- Historic England (M67) suggest that the neighbouring listed buildings should be highlighted
- WSCC have made reference to the library in that the road access to the car park provides access to the rear of the library for deliveries.

**Officer Response:** *It is expected that the allocation will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received during the consultation.*

## SITES - PROPOSED AREAS OF CHANGE

### AOCI - CENTENARY HOUSE

Southern Water highlights that reinforcement of local sewerage network and easement strips would be required. Underground infrastructure crosses the site which needs to be taken into account.

**Officer Response:** *It is expected that the development principles will remain largely unchanged but, where appropriate, minor amendments may be made in line with some of the comments received from Southern Water. It is hoped that in the coming months greater delivery certainty will be achieved which will allow for this site to become an allocation rather than an Area of Change.*

### AOC2 - BRITISH GAS SITE, LYNDHURST ROAD

Only two representations were made in relation to this site:

- Environment Agency (M63) - Support the redevelopment of the site but consideration needs to be given to the surface water drainage scheme
- Carter Jonas on behalf of Southern Gas Networks (M81) - support the approach being taken by the Council which will optimise the development potential of this current site.

**Officer Response:** *It is expected that the development principles will remain largely unchanged. It is hoped that in the coming months greater delivery certainty will be achieved which will allow this site to become an allocation rather than an Area of Change.*

### AOC3 - STAGECOACH SITE, MARINE PARADE

Only 4 representations made specific points relating to this site:

- Environment Agency (M63) - need clear criteria as to the requirements that would need to be met prior to the site being developed i.e. site specific flood risk assessment
- Southern Water (M74) - take account of underground infrastructure that crosses the site
- Historic England (M67) - amend requirements to recognise the proactive conservation and enhancement of adjacent heritage assets (their significance and setting)
- Worthing Society (M78) - redevelopment could allow for the reopening of Library Place which is an historic right of way. Consider extending site boundary to encompass the parking areas on the east side of Bedford Row to reinstate the historic garden area.

**Officer Response:** *It is acknowledged that the SFRA needs updating to provide a Level 1 assessment and Level 2 assessment for those sites that require the Exceptions Test. It is expected that the AOC will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received during the consultation.*

#### AOC4 - WORTHING LEISURE CENTRE

Six representations were submitted that were generally supportive of the redevelopment of the site and the delivery of a new leisure centre (some supported provision of new pool). However, several representations raised concerns relating to: the impact on local congestion; access arrangements; provision of infrastructure; loss of open space / playing fields / running track; and ensuring adequate parking provision. Comments were also received suggesting that there should be a cohesive plan for all sites in this area and that development should not have a negative impact on neighbouring occupiers.

**Officer Response:** *The Council is also updating its Sport, leisure and Open Space Study and is soon to appoint a master-planner to develop a range of options for how the site could be developed, to include leisure use, public open space and housing. Greater delivery certainty will be provided following the development of a full feasibility assessment, options appraisal and business case and it is hoped that the site may become an allocation in the next version of the Plan.*

#### AOC5 - HMRC OFFICES, BARRINGTON ROAD

Several representations support the redevelopment of this site but others raised concern about increased congestion and the provision of supporting infrastructure. The need to protect existing residents from the potential impacts of development was also raised. There were calls made for integration between the key development sites in local area.

- Monagu Evans LLP on behalf of Mapeley STEPS Ltd (M85) - expect that as more certainty is established that AOC5 will transfer into an allocation. Fully support the allocation of this site for residential development for 261 dwellings plus 146 retirement flats. Proposes that the employment allocation (western portion) is widened to incorporate a range of employment uses
- EM Goring Ltd, SGN & Mapeley STEPs Ltd (M99) - 3 parties are exploring a solution to maximise potential of AOC5 and AOC6 and increase the quantum of residential use whilst also assisting in bringing forward a significant level of employment land.

**Officer Response:** *The Council will continue to work with all interested parties to maximise the redevelopment of this (and adjoining sites) to bring forward the appropriate mix of residential and employment uses. Positive discussions with all interested parties are continuing and it is hoped that enough delivery certainty (particularly for the employment uses) can be provided in the coming months to allow for this and adjoining sites to be allocated within the Submission version of the Plan.*

#### AOC6 - MARTLETS WAY

A couple of representations support the redevelopment of this site but others raised concern about increased congestion and the provision of supporting infrastructure. The need to protect existing residents from the potential impacts of development was also raised. There were calls made for integration between the key development sites in local area.

- Carter Jonas for and on behalf of Southern Gas Networks (SGN = landowners of the former gasholder) (M81a) - support some of the requirements but policy is unsound the

identified indicative capacity of development does not include residential development, and the level of employment floorspace is too high. Amended policy to make clear that employment generating uses, beyond those falling in B Class uses will be supported

- Rapleys for EM Goring Ltd (M96) - To maximise development potential Rapleys are in active discussions with SGN (and the promoter of the HMRC site) in the interest bringing forward the two (or three) sites as a comprehensive development or as part of a phased set of proposals. Employment floorspace is only viable with residential development to support it. Supports some development requirements but, as drafted, policy is unsound as it does not include residential development and the level of employment floorspace is too high. Policy should also be amended to make clear that employment uses, beyond those falling in B Class uses will be supported
- EM Goring Ltd, SGN & Mapeley STEPs Ltd (M99) - 3 parties are exploring a solution to maximise potential of AOC5 and AOC6 and increase the quantum of residential use whilst also assisting in bringing forward a significant level of employment land.

**Officer Response:** *The Council will continue to work with all interested parties to maximise the redevelopment of this (and adjoining sites) to bring forward the appropriate mix of residential and employment uses. Positive discussions with all interested parties are continuing and it is hoped that enough delivery certainty (particularly for the employment uses) can be provided in the coming months to allow for this and adjoining sites to be allocated within the Submission version of the Plan.*

## SITES - OMISSION SITES

### OSI - LAND EAST OF TITNORE LANE

Nine representations (including 5 organisations) supporting the site being omitted from designation. Some of these respondents also supported the proposed amendment that would remove this site from within the existing built up area boundary. Key concerns raised primarily relate to environmental sensitivities including impact on: ancient woodland; wildlife; local highways; flooding; and the setting of National Park. In particular, Natural England (M83) raised concern that development would affect a Local Wildlife Site / priority habitat and that impacts to ancient woodland should also be avoided in line with the requirements of the NPPF.

The site promoter has submitted evidence to demonstrate how the identified constraints can be overcome. A revised illustrative masterplan shows the number of dwelling from 126 to 73 whilst retaining the previously proposed access point onto Titnore Lane. They would object to the site being deleted from the Built up Area Boundary given that there is an acknowledged housing need.

**Officer Response:** *In liaison with key partners (WSCC, Natural England, SDNP etc) consideration will be given to the evidence submitted by the site promoter to assess whether the identified constraints could be overcome. Depending on this assessment the site will either be taken forward as an allocation or removed from the next version of the Plan.*

## OS2 - LAND NORTH OF BEECHES AVENUE

Three representations support the site being omitted from designation. Concerns raised include impact on the setting of the National Park; local access arrangements and congestion on the A27.

The site promoter argues that the site should be allocated for residential development as the identified constraints can be overcome and that 90 dwellings could be delivered early in the Plan period. A suitable access road can be created to the Beeches Avenue site from Lyons Way across the car parking area within the football club site (OS3).

**Officer Response:** *In liaison with key partners (WSCC, Highways England, SDNP and Worthing Utd FC etc) consideration will be given to the evidence submitted by the site promoter to assess whether the identified constraints could be overcome. Depending on this assessment the site will either be taken forward as an allocation or removed from the next version of the Plan.*

## OS3 - WORTHING UNITED FOOTBALL CLUB

Nine representations argued that it would be unacceptable to develop this site, primarily due to the loss of a sports / community facility. This included a representation made on behalf of Worthing United FC (E56). Other concerns raised were: local access; congestion on the A27; impact on South Downs National Park; and impact on motor cycling training centre.

The promoters of the site (M94) state that the site should be allocated for development and that the identified constraints can be overcome. The lease for this site does not give long-term security for football use, nor is the site of adequate quality or size for the club to realise its ambitions. It is recognised that this site might come forward later the plan period to allow for appropriate arrangements for sports and recreation provision to be made in the town. In this regard, the representation states that part of the site could initially provide access to Beeches Ave without compromising use of the Football Ground.

**Officer Response:** *In liaison with key partners (WSCC, Highways England, SDNP and Worthing Utd FC etc) consideration will be given to the evidence submitted by the site promoter to assess whether the identified constraints could be overcome. The Council is also updating its Sport, leisure and Open Space Study. Depending on this assessment the site will either be taken forward as an allocation or removed from the next version of the Plan.*

## PART 4 - CORE POLICIES

### CORE POLICIES - HOMES AND NEIGHBOURHOODS

#### CPI - HOUSING MIX AND QUALITY

12 representations were made in relation to CPI. Some of which are broadly supportive recognising the Council's approach to housing need for the disabled and an ageing population. Other general comments include concern about second home ownership and a glut of retirement flats on the market:

- Turning Tides (E63) states that the Plan should better reflect the needs of single people and suggests that the provision of studio flats would in part help meet this need
- Retirement Housing Consortium (M75) - Policy is encouraging but consider that the best approach is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and extra care accommodation and a separate requirement for homes to be built to a standard that is suitable for the elderly
- House Builders Federation (M79) and three other representations comments that the Policy does not cover sufficient flexibility and that there is insufficient evidence to support the requirement for all homes to be built to Part M4(2) and 10% to M4(3).

**Officer Response:** *Further work will be undertaken to better understand up-to-date housing needs - particularly how best the needs of an aging population will be met. In addition, evidence will be put in place to assess whether the proposed accessibility standards can be justified.*

#### CP2 - DENSITY

14 representations were made in relation to Policy CP2. Three representations support the policy. The others make specific comments or have requested clarification / suggested amendments to be made:

- Minimum densities proposed are not high enough given the overwhelming need for housing
- 2 reps (including Mid Sussex District Council - M59) suggest that higher densities could be achieved, particularly in sustainable locations with good or excellent accessibility
- Concern that higher densities will place added impacts on infrastructure
- Turning Tides (E63) and one other representation suggest that the policy is amended to provide flexibility for 'transition housing' for studio flats with a space standard minimum of 28m<sup>2</sup>.
- One representation (M91) considers that the policy is unsound as it has not been justified. No evidence has been provided in relation to the need for such internal space standards.
- Another similar representation (M103) comments that a revised version of this policy should instead seek to protect against particularly low - quality developments whilst still providing flexibility for increased provision and more intuitive higher density solutions.



**Officer Response** - Further work is being undertaken to assess the urban fabric of Worthing and opportunities to increase the density of new development - this may influence the minimum density standards to be taken forward in the next version of the Plan. Working with key stakeholders, the Council will also review evidence that supports the proposed space standards - in particular, this will include consideration of smaller dwellings / studio flats and whether more flexibility could be justified.

### CP3 - AFFORDABLE HOUSING

10 representations that made a variety of comments were received in response to Policy CP3:

- Policy should refer to net increases in residential units not gross
- Council should be an affordable housing provider
- Needs to have more sites for affordable and social housing
- Policy needs to be tightened to ensure affordable housing is delivered
- Retirement Housing Consortium (M75) - policy is contrary to the NPPF as the Council has not considered the economic viability of development to inform the targets set
- House Builders Federation (M79) there is no up to date viability evidence to support the approach to affordable housing set out in this policy and Part d) should be deleted.

**Officer Response** - Working with affordable housing providers and the Council's Housing Team, the policy will be reviewed to respond to the latest guidance and evidence. In addition, a 'Whole Plan Viability Assessment' will be undertaken which will assess the economic viability of the proposed policy approach.

### CP4 - GYPSY AND TRAVELLERS AND TRAVELLING SHOWPEOPLE

Two representations were received. The Environment Agency (M63) supports the Policy. The other representation asked for clarification on whether Gypsies, Travellers and Travelling Showpeople were consulted on the Policy.

**Officer Response:** The national Federation of Gypsy Liaison Groups was consulted on the Draft Local Plan. The Council is updating its Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment where Gypsies, Travellers and Travelling Showpeople and relevant organisations were contacted as part of the field work survey. It is expected that this update will be published in the spring.

### CP5 - QUALITY OF THE BUILT ENVIRONMENT

9 representations were received in response to Policy CP5. 5 representations, including The Worthing Society (M78), Natural England (M83) and Brighton and Hove City Council (M89) broadly support the principle and aims of the policy.

- Historic England (M67) - disappointed that the policy makes no requirements to the conservation, enhancement and promotion of enjoyment of heritage assets
- Natural England (M83) and Sussex Wildlife Trust (M86) suggest text amendments. Other

general comments include:

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received.*

## CP6 - PUBLIC REALM

General support regarding the principle of Policy. Other comments / suggested amendments include:

- Need to ensure that areas are accessible and appropriate for all ages and abilities
- Criterion e) - not clear why the last sentence singles out illumination for special consideration. Delete last sentence as it is entirely unnecessary
- Support for speed reductions and traffic calming
- Improvements should not drive away visitors arriving by bus and coach to the seafront.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received.*

## CORE POLICIES - SUSTAINABLE COMMUNITIES

### CP7 - HEALTHY COMMUNITIES

Natural England (M83), Sussex Wildlife Trust (M86) and Horsham DC (M76) submitted comments in support of CP7. Additional amendments have been suggested to strengthen / clarify the Policy.

- Clarify what the Health Impact Assessment will require
- Reference noise and air quality
- Greater reference needs to be made to the positive benefits associated with food growing
- Importance of informal recreation is underestimated.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received.*

## CP8 - OPEN SPACE, RECREATION AND LEISURE

Representations support the general principles of CP8. Suggested amendments have been made to strengthen the Policy:

- Need to consider access to open space etc for those people who have limited mobility / disabled
- Goring Residents Association (M28) request that the Plan specifically recognises the Goring Greensward's Village Green status with its associated legal protection
- Reference Public Rights of Way and Equestrian routes and the need for connections to be made to new development
- Clarification is required for CIL exemptions for Retirement Housing
- Clarification reference to site contributions when open space is currently listed on Reg 123 List
- Ensure a net gain of open space where existing open space is lost through development
- Worthing Society (M78) - parks and sports facilities are not as safe as they should be.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received. Points relating to CIL will be clarified and reference will be made to the Greensward's Village Green status. The Council is also updating its Sport, leisure and Open Space Study and this will inform the policy wording.*

## CP9 - PLANNING FOR SUSTAINABLE COMMUNITIES / COMMUNITY FACILITIES

General comments have been made which include:

- Policy states the Council will seek planning obligations to secure new and improved community facilities and services but this is addressed through CIL payments. This needs clarifying
- Highlight need to education infrastructure and day centres to support the elderly
- Worthing Hospital needs more car parking provision.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received - this will include clarification relating to the use of CIL.*

## CP10 - DELIVERING INFRASTRUCTURE

Policy is supported by a number of organisations including Southern Water (M74), Sussex Wildlife Trust (M86), Natural England (M83) and Goring and Ilex Conservation Group (E61). In addition, general comments have been made regarding the need for infrastructure to be put in place to support new development. Amendments requested to address CIL discretionary relief and provision for EV Charging.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received.*

## CORE POLICIES - LOCAL ECONOMY

### CP11 - ECONOMIC GROWTH AND SKILLS

- Brighton and Hove City Council (M89) support Town Centre first approach to new office space and safeguarding existing employment areas
- Plan should recognise the strong engineering, manufacturing and pharmaceutical presence. Opportunities for creating an enterprise hub for a developing technology cluster
- One representation was received stating that the Plan is not clear how or why new development should address local skills shortages. Requirement (criterion x) is considered not to be necessary to make the development acceptable and thus does not meet the CIL Regulations 2010.

**Officer Response:** *Criterion x that relates to skills will be reassessed in light on the comments received.*

### CP12 - PROTECTING AND ENHANCING EXISTING EMPLOYMENT SITES

No representations were received pertaining to this Policy - as such, it is expected that this policy will remain largely unchanged. However, this will be informed by an update to the Council's economic / employment evidence which, alongside other evidence being progressed (e.g. the Open Space and leisure facilities study) will help to inform the employment uses / areas that may be protected and where a greater degree of flexibility may be acceptable.

### CP13 - THE VISITOR ECONOMY

In general, the Policy is welcomed however the Worthing Society (M78) have said that more needs to be done to maximise the potential of Worthing's historic character, leisure and culture assets, watersports and seafront. It is suggested that there is a dedicated tourist office in a highly visible seafront location. Another comment has stated that Beach huts should be located behind the promenade as views of the sea are currently obstructed by the beach huts whilst walking along the prom.

**Officer Response:** It is expected that the policy and supporting text will remain largely unchanged but the comments made by the Worthing Society may result in minor changes being made to the wording.

## CP14 - RETAIL

Comments were generally supportive. However, some respondents felt that the Policy needed to ensure that the town centre retail units have sufficient flexibility in terms of use class to respond to demand. One suggestion was that the Montague shopping Centre should be removed from Primary Zone A and reclassified as Zone B as the classification is considered to be too restrictive. Other comments include:

- Need for more 'anchor' shops
- Concerns about the high number cafes and coffee shops
- Goring and Ilex Conservation Group (E61) have commented that District and Local Centres should provide a variety of uses / retailers
- Questions have been raised whether it is appropriate to allow more retail within development opportunities (i.e. Teville Gate) given that the current economic / retail climate.

**Officer Response** - it is acknowledged that the retail sector is going through significant change and that this is likely to have implications for all areas, particularly the town centre. Whilst the evidence put in place to support the draft Local Plan strongly supported the policy position established in CP14 it is accepted that this needs to be updated to reflect more recent changes in guidance, the retail market and wider aspirations for the town centre. The proposed policy position will be reconsidered to assess whether a greater degree of flexibility within the retail hierarchy would be beneficial.

## CORE POLICIES - HISTORIC ENVIRONMENT

### CP15 - A STRATEGIC APPROACH TO THE HISTORIC ENVIRONMENT

Historic England (M67) welcome CP15 and CP16 and broadly support their wording. However, they suggest that Policy CP15 is refined and relocated to Part 2 Spatial Strategy. Other comments include:

- Worthing Society (M78) welcome policy but suggest areas that could be strengthened
- One representation states that CP15 is a set of objectives rather than a policy.

**Officer Response:** Officers will continue to work with heritage colleagues and partners, and with Council Members, to arrive at a strong strategic approach to the historic environment which can be implemented. In line with the suggestion made by Historic England consideration will be given to moving CP15 to Part 2.

## CP16 - THE HISTORIC ENVIRONMENT

Historic England (M67) welcomes the inclusion of CP16 but suggests that title of Policy is amended to 'Development Affecting the Historic Environment'. Other comments include:

- Policy is too long and duplicates national policy
- Worthing Society (M78) suggest amendments to strengthen Policy
- Protect Conservation Areas and key cultural centres / buildings and parks.

**Officer Response:** *Officers will continue to work with heritage colleagues and partners, and with Council Members, to arrive at a strong development management approach to the historic environment which can be implemented. The policy will be renamed in line with the suggestion made by Historic England.*

## CORE POLICIES - ENVIRONMENT AND CLIMATE CHANGE

### CP17 - SUSTAINABLE DESIGN

7 representations support this policy including the Environment Agency (M63), Southern Water (M74), Natural England (M83) and WBC Sustainability (M110). Other comments include:

- One representation considers that the policy introduces significant additional requirements on new development that has not been justified and that this will constrain housing delivery
- WBC Sustainability suggests some detailed amendments to help strengthen policy further.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received. A 'Whole Plan Viability Assessment' will be undertaken which will assess the economic viability of the proposed policy approach.*

### CP18 - ENERGY

A few amendments have been suggested to further strengthen the Policy. In addition:

- Natural England (M83) have stated that proposals for wind energy developments should be required to consider their visual impact on the South Downs National Park
- Scotia Gas Networks (M147) has suggested that developments include renewable technologies, especially those related to the production of biomethane.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received.*

## CP19 - BIODIVERSITY

6 representations support the key aims of CP19. Other comments include:

- CPRE (M92), Sussex Ornithological Society (M109) and WBC Sustainability suggest amendments to strengthen policy
- EA (M63) suggest amendment to ensure that primary intention is that harm would be avoided
- Natural England (M83) suggest a requirements to address coastal squeeze and that contributing to environmental net gains should not be restricted to major development
- Sussex Wildlife Trust (M86) supports the suggestion of an increase in woodland cover in appropriate locations. Suggests modifications to ensure policy reflects the ethos of NPPF 2018
- SWT and Sussex Ornithological Society suggest change to text of policy which would require some biodiversity assets to be mapped that are not currently mapped (e.g. wildlife corridors)
- Concern that the exceptions in the mitigation hierarchy gives too much leeway for developers.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received and in response to any relevant changes in guidance.*

## CP20 - GREEN INFRASTRUCTURE

6 representations support CP20. Comments include:

- Sussex Wildlife Trust (M86) recommend the Green Infrastructure Plan is strongly embedded in the Local Plan and associated documents such as the Infrastructure Development Plan
- Refer to the benefits of food growing
- 'Network' should include reference to public rights of way as green corridors
- Worthing Society (M78) recognise that green spaces are an important amenity and social benefit
- Sussex Ornithological Society (M109) states that any future strategy should integrate policy initiatives by the South Downs National Park and adjoining Local Authorities.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received.*



## CP21 - FLOOD RISK & SUSTAINABLE DRAINAGE

There is general support for this policy but a number of specific comments have been made:

- Environment Agency (M63) policy should refer to the need for sites to meet the sequential test and ensure that development be directed away from the areas at the highest risk of flooding. Supporting text should be amended to reference the Sequential and Exceptions Test document
- Major developments should be required to renovate drainage systems with more suitable SUDs
- Policy needs to be clear that WSCC SUDS requirements only apply to sites that are being comprehensively redeveloped (para 163 of the NPPF)
- Requirement for flood risk assessments on applications in flood zones 2 and 3 is excessive and should only apply to developments where there is likely to be significant flood risk implications
- Where proposals in do not propose increases in floorspace at ground floor level the requirement to provide a comprehensive flood risk assessment should be applied pragmatically.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received. It is acknowledged that the SFRA needs updating to provide a Level 1 assessment and Level 2 assessment for those sites that require the Exceptions Test. This will include updates to information on other sources of flooding including surface water flooding, new climate change allowances and will also need to consider cumulative impact as required by the NPPF. The recommendations of this will inform the wording of this policy.*

## CP22 - WATER QUALITY & PROTECTION

Environment Agency (M63) and Southern Water support this Policy. Other comments include:

- Environment Agency recommends that it should be noted that in some instances further assessments would be required (bullet c)
- Natural England and WBC Sustainability have suggested some amended wording to the text
- Para 4.270 - as of November 2018, the bathing water was classified as sufficient.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received.*

## CP23 - POLLUTION

Environment Agency (M63) and Sussex Wildlife Trust (M86) support the Policy. Other comments include:

- Consider orientation of buildings in reducing impact of pollution
- Incorporate light pollution with regards to International Dark Skies Reserve
- Refer to the latest Noise Action Plan (rather than a dated version)
- Recommend requiring developers to have regards to the 'Planning Noise Advice Document - Sussex' before submitting planning applications where noise will have to be considered
- "Air Quality and Emissions Mitigation Guidance for Sussex' should be incorporated into a SPD.

**Officer Response:** *It is expected that the policy and supporting text will remain largely unchanged but, where appropriate, minor amendments will be made in line with some of the comments received.*

## CORE POLICIES - CONNECTIVITY

### CP24 - TRANSPORT AND CONNECTIVITY

27 representations were submitted in response to Policy CP24. In general, concern was raised about the levels of congestion and capacity of infrastructure to cope with growth. A number of comments support and encourage a shift towards sustainable transport / active travel modes. In particular, these include:

- Prioritise and improve cycle paths and walkways
- Concern about air quality
- Support for a Park and Ride scheme
- Liaison with WSCC and service providers to improve public transport
- Include policies to support walking to school and a public transport system for school children
- Support the provision of Electric Vehicle Charging points
- Deliver safe crossings over the A27 to improve access and provide a network of off-road multi-use PRow routes ( 2 representations including The British Horse Society M100)
- West Sussex County Council (M152) - policy would benefit from strengthening for road safety

- Sustrans (M108) - policy has no sense of urgency; no measurable targets; and insufficient detail to turn an aspiration into a coherent plan. Suggest a move away from the 'predict and provide' approach and provide specific commitments to support the NPPF objectives to prioritise walking and cycling. Conclusion is vague and at odds with the WS Local Transport Plan and does not recognise the importance of the emerging Road Space Audit.

Highways England (M111) has expressed their concern that the Transport Assessment does not address their concerns with regard to the cumulative impacts of the strategic allocations presented in the Plan. Have requested further information.

**Officer Response:** Consideration will be given to how the policy and supporting text can be strengthened to promote sustainable modes and address road safety. Further work is currently being undertaken to address the concerns relating the Transport Assessment raised by Highways England.

## CP25 - DIGITAL INFRASTRUCTURE

2 representations were received in response to Policy CP25. Sussex Wildlife Trust (M86) proposes a modification. West Sussex County Council (M152) supports para 4.301 and recommends that the that the policy specifically references gigabit-capable full fibre infrastructure in order to provide future proofed broadband services and to support the delivery of 4G and 5G mobile technology.

**Officer Response:** It is expected that the policy and supporting text will remain largely unchanged but, consideration will be given to the suggested reference to gigabit-capable full fibre infrastructure.

## SUSTAINABILITY APPRAISAL

As part of the consultation on the DLP comments were also invited on the associated Sustainability Appraisal (SA). Only one representation (Lewis and Co Planning - M103) made specific points:

- Not clear why the SA has rejected a need led approach to housing - this is contrary to NPPF
- SA has not undertaken any assessment of the impacts of not meeting these needs.
- Conclusion of SA under Housing Mix and Quality places further requirements on housing developers without understanding the viability impacts or potential impacts on delivery rates
- All reasonable alternative options have not been fully explored. A proactive approach to increasing densities needs to be considered and assessed through the SA.

**Officer Response:** The SA Report will be updated to accompany the next stage of the Plan. This will include appraisals of further options identified through this consultation and as a result of new evidence produced.

## SHLAA / CALL FOR SITES

Given the very constrained nature of the Borough, the Council has published a comprehensive Strategic Housing Land Availability Assessment (SHLAA). To support this process, at all appropriate stages (including during this consultation), the Council has published a 'call for sites' when landowners and developers are encouraged to put forward any realistic development opportunities for consideration. As set out below, only 3 'new' sites were put forward at this stage:

- Indigo Planning for New River Retail ( M106) - review SHLAA methodology to consider a greater number of potential sites - to include consideration of the Montague Shopping Centre
- Indigo Planning for Beales (M93) - promote site 19-23 and 35-39 South Street and 5 - 13 Liverpool Buildings, Liverpool Road (Beales) for inclusion in SHLAA and the Local Plan
- Henry Adams for WSCC (M112) - Promoting a WSCC owned site. Site was previously assessed and rejected through the SHLAA (WB15011) due to its size but the representation considers that the site could accommodate more than 6 units.

**Officer Response:** *Promoted sites will be given careful consideration as the SHLAA is reviewed/updated.*

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