WORTHING BOROUGH COUNCIL

DRAFT INTEGRATED IMPACT ASSESSMENT – MAIN REPORT

Sustainability Appraisal Report incorporating Habitat Regulations Assessment, Equalities Impact Assessment and Health Impact Assessment

Regulation 18

October 2018

wlp | Worthing Local Plan

WBC

WORTHING BOROUGH COUNCIL

Draft Integrated Impact Assessment Report

Contents

Part 1: Introduction
1.1 Background
1.2 Approach to Integrated Impact Assessment
1.3 The structure of this Report

Part 2: What is the Scope of the Sustainability Appraisal?
2.1 Introduction
2.2 What is the Plan seeking to achieve?
2.3 What is the sustainability context?
2.4 What is the sustainability baseline?
2.5 What are the key issues and objectives?

Part 3: What has Plan making involved up to this point?
3.1 A new Local Plan
3.2 Reasons for selecting alternatives

Part 4: What are the appraisal findings at this current stage?
4.1 Introduction
4.2 Methodology
4.3 Appraisal of Local Plan Strategic Objectives
4.4 Appraisal of Sites
4.5 Appraisal of Options
4.6 Total, Cumulative and Synergistic Effects
4.7 Recommendations

Part 5: What are the next steps?
5.1 Consultation
5.2 Proposed Monitoring Framework

Appendices
A Legal and Policy Background
B Responses to Scoping Report
C Site Specific Criteria
D1 Sites Appraisal
D2 Options Appraisal
D3 Appraisal of Draft Local Plan
E Habitats Regulations Assessment Screening

Part 1: Introduction

1.1 Background

1.1.1 The Worthing Local Plan is being prepared by Worthing Borough Council. Once adopted it will set the planning framework for the part of the borough outside of the South Downs National Park over the next 15-20 years.

1.1.2 This Integrated Impact Assessment (IIA) has been produced to inform the Draft Worthing Local Plan and should be read alongside the Draft Worthing Local Plan, the Local Plan Sustainability Appraisal Scoping Report (March 2015) and other relevant evidence base studies.

1.2 Approach to Integrated Impact Assessment

1.2.1 IIA is an approach that assesses the potential impacts of proposals (strategies, policies, programmes, projects, plans or other developments) on issues that previously may have been assessed separately in a single process.

1.2.2 IIA therefore covers more than one type of impact assessment in a single process. This can improve efficiencies in both the assessment itself, as many of the issues covered in the different forms of assessment overlap, as well as simplifying outcomes and recommendations.

1.2.3 The IIA fulfils the statutory requirements to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) as well as an Equalities Impact Assessment (EqIA), and although there is no statutory obligation, a Health Impact Assessment (HIA). In addition a Habitat Regulations Assessment (HRA) Screening has been undertaken of the potential effects of the Local Plan on the Natura 2000 network to determine whether the Local Plan will either alone or in combination with other relevant projects and plans, be likely to result in a significant adverse effect upon European protected sites and therefore whether an Appropriate Assessment is required. This can be found in Appendix E.

1.2.4 Each of these is discussed in turn below.

Sustainability Appraisal and Strategic Environmental Assessment

1.2.5 Sustainability Appraisal (SA) is integral to the preparation and development of a Local Plan and it is a requirement of the Planning and Compulsory Purchase Act (2004).

1.2.6 The purpose of the SA is to promote sustainable development by integrating sustainability considerations into Local Plans. The SA aims to make a Local Plan more sustainable and more responsive to its environmental effects, by identifying the Local Plan's significant impacts and ways of minimising its negative effects.

1.2.7 The SEA/SA 'tells the story' of the Local Plan making process. It documents how planning decisions have been made, and how they have been informed by environmental and sustainability concerns.

1.2.8 The SEA Directive provides a means of ensuring that due consideration has been given to environmental issues during the preparation and adoption of strategic level plans. The SEA Directive and Regulations state that the SEA must consider the following topic areas:
- Biodiversity
- Population
- Human Health
- Fauna
- Flora
- Soil
- Water
- Air
- Climatic Factors
- Material Assets
- Cultural heritage, including archaeological and built heritage
- Landscape

1.2.9 In line with the national Planning Practice Guidance (NPPG), the SA should meet all the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, which implements the EU Strategic Environmental Assessment (SEA) Directive (Directive 2001/42/EC).

1.2.10 SA is an iterative process undertaken during the preparation of a Local Plan. The process is an opportunity to consider options by which the Local Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. SA's are intended to inform the decision making process and to provide a mechanism of reviewing alternative options, not to make decisions on policy development.

1.2.11 The SA process has five main stages (A-E) based on legal requirements. The SA process works in parallel with the preparation of the Local Plan and links across at all stages. A simplified version of the SA methodology is illustrated in Figure 1.

1.2.12 Stage C is the preparation of the SEA/SA report. The SA is intended to inform the decision making process and to provide a mechanism of reviewing alternative options and evaluating likely effects. This draft report is the main product of the Plan appraisal process up to this point.

Health Impact Assessment

1.2.13 There is no statutory requirement for a Health Impact Assessment (HIA) and therefore there is no standard methodology to inform the HIA process. However, this is a recognised process for considering the health impacts of Local Plans and is widely seen as best practice.
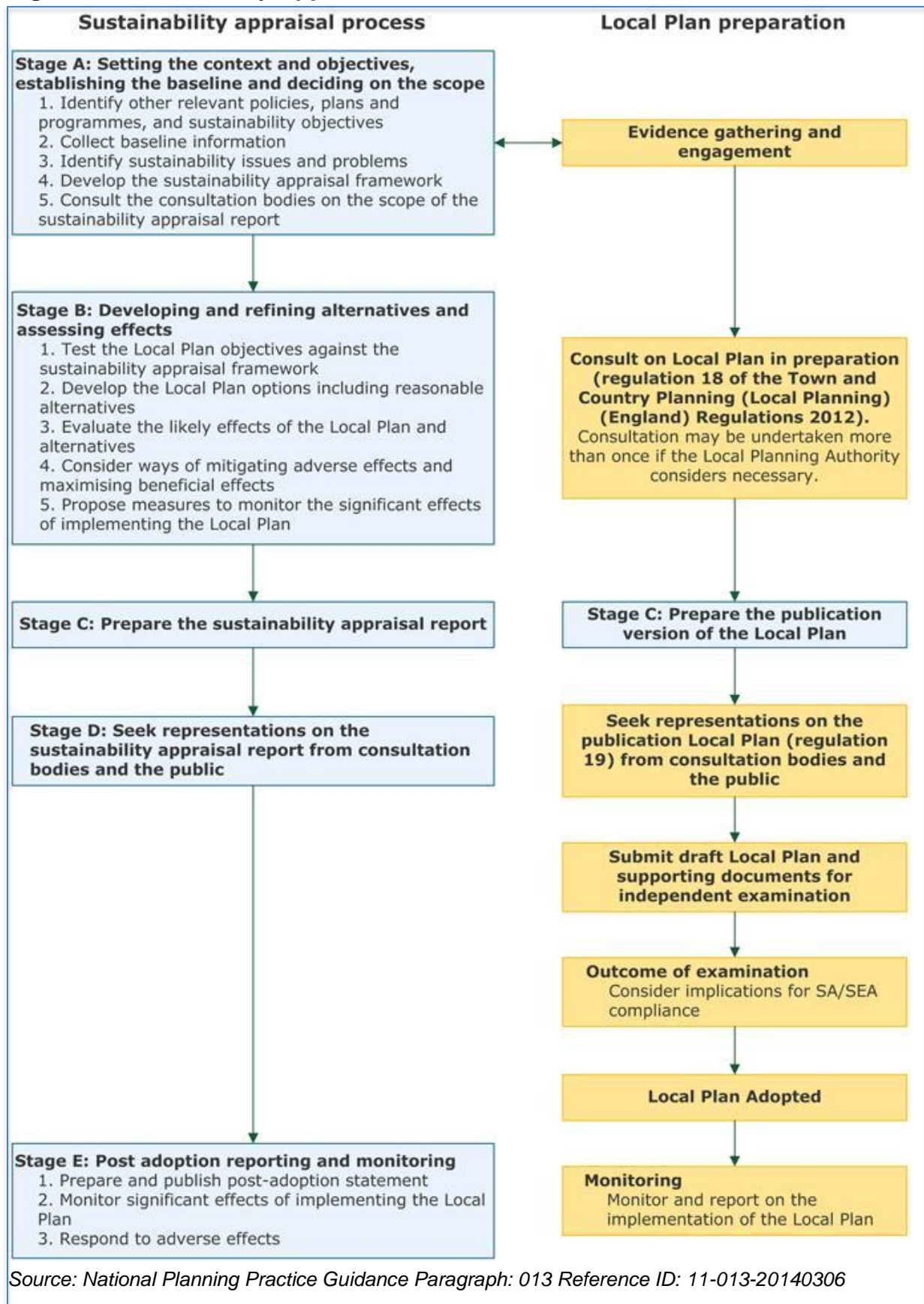
1.2.14 A HIA is intended to help make decisions by predicting the health consequences if a proposal were to be implemented. In addition to assessing the health consequences it also produces recommendations as to how the good consequences for health could be enhanced and how the bad consequences could be avoided or minimised. The PPG states that a HIA may be a useful tool to use where there are expected to be significant impacts.

1.2.15 HIA is commonly defined as "a combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population."

1.2.16 Health encompasses a wide range of social, economic and environmental factors that affect both people's physical health and mental well-being. These factors are known as the 'wider determinants' of health. It is recognised that health is a cross-cutting issue that touches upon many key planning policy areas within Local Plans (i.e. housing, transport, open space & recreation, public realm design, pollution etc). The Local Plan is one of many tools that can assist with addressing the wider determinants of health therefore supporting the priorities contained within Adur and Worthing Councils' Public Health Strategy 2018 - 2021 'Start Well, Live Well, Age Well' (2018).

1.2.17 Given the important link between health and planning, it is considered prudent to incorporate a HIA within the IIA to ensure that potential health impacts are fully assessed. Within the context of the Local Plan, the aim is to identify the main potential health and well-being impacts in order to identify any opportunities for the emerging planning policies to maximise health benefits, address existing health determinants and avoid any potential adverse impacts.

Figure 1: Sustainability Appraisal Process

Sustainability appraisal process	Local Plan preparation
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope 1. Identify other relevant policies, plans and programmes, and sustainability objectives 2. Collect baseline information 3. Identify sustainability issues and problems 4. Develop the sustainability appraisal framework 5. Consult the consultation bodies on the scope of the sustainability appraisal report	**Evidence gathering and engagement**
Stage B: Developing and refining alternatives and assessing effects 1. Test the Local Plan objectives against the sustainability appraisal framework 2. Develop the Local Plan options including reasonable alternatives 3. Evaluate the likely effects of the Local Plan and alternatives 4. Consider ways of mitigating adverse effects and maximising beneficial effects 5. Propose measures to monitor the significant effects of implementing the Local Plan	**Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).** Consultation may be undertaken more than once if the Local Planning Authority considers necessary.
Stage C: Prepare the sustainability appraisal report	**Stage C: Prepare the publication version of the Local Plan**
Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public	**Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public**
	Submit draft Local Plan and supporting documents for independent examination
	Outcome of examination Consider implications for SA/SEA compliance
	Local Plan Adopted
Stage E: Post adoption reporting and monitoring 1. Prepare and publish post-adoption statement 2. Monitor significant effects of implementing the Local Plan 3. Respond to adverse effects	**Monitoring** Monitor and report on the implementation of the Local Plan

Source: National Planning Practice Guidance Paragraph: 013 Reference ID: 11-013-20140306

Equalities Impact Assessment

1.2.18 An Equalities Impact Assessment (EqIA) is not a statutory requirement but it is a tool that assists Councils to comply with the requirements under the Equality Act 2010. The Act includes a public sector equality duty which aims to ensure that everyone has a fair chance in life. It contains a requirement for Local Authorities to consider the diverse needs and requirements of the communities in the borough when planning its services. Local Authorities also have a duty under the Race Relations (Amendment) Act, 2000, Disability Discrimination Act, 2005 and the Equality Act, 2006 (Gender Equality) to positively promote race, disability and gender equality.

1.2.19 Adur and Worthing Councils use Equalities Impact Assessment (EqIA), where appropriate, in order to improve the work of the Councils. The purpose of the EqIA is to improve the work of the Councils by making sure it does not discriminate and that, where possible, it promotes equality. It is a way of considering the likely effects of policies and decisions on different groups living and working in Worthing that are protected from discrimination by the Equality Act. The Equality Act protects people from discrimination on the basis of certain characteristics. These are known as protected characteristics of which there are nine:
- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

1.2.20 It is not necessary to include the characteristic of marriage and civil partnership except in relation to employment procedures. This characteristic is therefore not included in this IIA.

1.2.21 Under the equality duty, public authorities are not required to follow any specific methodology or template to undertake EqIA but they need to be able to show that they have had due regard to the aims set out in the general equality duty. It is generally agreed that an EqIA should start at the earliest opportunity prior to policy development and is an ongoing and cyclical exercise enabling equality considerations to be taken into account before a decision is made.

1.2.22 It is considered that there will be similarities in assessment between the EqIA and the HIA in terms of 'health' and 'equalities' being characteristics that affect people i.e. the local population.

1.3 The structure of this Report

1.3.1 In line with the SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004), this Report must essentially answer four questions:
1. What's the scope of the SA?
2. What has Plan-making / SA involved up to this point?
3. What are the appraisal findings at this current stage?
4. What happens next?

1.3.2 These questions are derived from Schedule 2 of the Regulations, which present the 'information to be provided within the report. Table 1 explains the links between these and the regulatory requirements.

Table 1: Questions that must be answered by the SA Report to meet Regulatory Requirements

SA REPORT QUESTION		IN LINE WITH SCHEDULE II OF THE SEA REGULATIONS, THE REPORT MUST INCLUDE…
What's the scope of the SA?	What's the Local Plan seeking to achieve?	An outline of the objectives of the Local Plan and relationship with other relevant plans and programmes.
	What's the sustainability 'context'?	Relevant environmental protection objectives, established at international or national level Existing environmental problems which are relevant to the plan including those relating to areas of particular importance
	What's the sustainability 'baseline'?	Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the Local Plan Environmental characteristics of areas likely to be significantly affected Existing environmental problems which are relevant to the Local Plan including those relating to areas of particular importance

SA REPORT QUESTION		IN LINE WITH SCHEDULE II OF THE SEA REGULATIONS, THE REPORT MUST INCLUDE…
	What are the key issues & objectives that should be a focus?	Problems / issues / objectives that should be a focus of appraisal
What has Plan-making / SA involved up to this point?		Outline reasons for selecting the alternatives dealt with (and thus an explanation of 'reasonableness') The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal / a description of how environmental objectives and considerations are reflected in the Local Plan
What are the appraisal findings at this current stage?		The likely significant effects associated with the draft Local Plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of the Local Plan
What happens next?		A description of the monitoring measures envisaged

*N.B. The right-hand column of Table 1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix A** of this report.*

1.3.3   This document is the Draft IIA Report of the Draft Worthing Local Plan (2018), and hence needs to answer all four of the questions listed above with a view to providing the information required by the Regulations. Each of the four questions are answered in turn, below.

Part 2: What is the Scope of the Sustainability Appraisal?

2.1 Introduction

2.1.1   The aim of Part 2 of this Report is to introduce the scope of the SA. In particular, and as required by the Regulations (Environmental Assessment of Plans and Programmes Regulations 2004), this part of the Report answers the following questions:

- What's the Local Plan seeking to achieve?
- What's the sustainability context?
- What's the sustainability baseline?
- What are the key issues and objectives that should be a focus of the SA?

2.1.2   The Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are Natural England, The Environment Agency and Historic England. In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'. These bodies along with other stakeholders in relation to Equalities Impact Assessment and Health Impact Assessment were consulted on the SA Scoping Report for the statutory five week consultation period from Monday 16 March to Monday 20 April 2015.

2.1.3   The Scoping Report set out the methodology and framework for the SA of the Local Plan. The aim of this was to obtain comment and feedback on the scope and level of detail of the SA. Appendix B sets out the responses received and how they were addressed. The responses received resulted in the SA Framework and methodology being refined. The consultation bodies were consequently reconsulted on the revised framework and methodology from 7 March to 15 April 2016. The full SA Scoping Report was published on the Council's website during the 'Your Town, Your Future' 2016 Local Plan consultation between 11 May and 22 June 2016.

2.1.4   The Scoping Report provides an agreed 'basis' for appraisal; however it is important to note that the 'scope' for the appraisal is unlikely to remain static given that the understanding of sustainability problems/issues/objectives inevitably evolve over time and situations change.

2.2 What is the Plan seeking to achieve?

> The SA Report must include:
> - Outline the main objectives of the plan and relationship with other relevant plans and programmes.

2.2.1 The Draft Local Plan provides the broad policy framework and a long-term strategy to manage development, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities within Worthing.

2.2.2 Once the spatial strategy has been established, the Local Plan must then make clear what development is intended to happen over the life of the Plan until 2033, where and when this will occur and how it will be delivered. This is done by establishing and designating key developments sites and specific allocations of land for different purposes. Criteria-based policies are also used to guide and help consider development proposals. An associated Policies Map is used to illustrate geographically how the adopted policies will be applied.

2.2.3 Once adopted, the new Plan will replace the borough's local planning policies set out in the Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003). It will inform the preparation of a number of future planning policy documents and will be an important consideration in deciding planning applications. It will also inform related strategies and projects proposed by the Council, its partners and stakeholders.

2.2.4 The new Local Plan will cover most of Worthing borough. However, unlike the existing Core Strategy, it will not cover the land in the north of the borough that lies within the South Downs National Park. The South Downs National Park Authority is producing a Local Plan which will set planning policy for the South Downs National Park boundary as whole.

How does the Local Plan relate to other plans?

2.2.5 The Local Plan must be aligned with and conform to a number of other influences including national policy and local strategies. Key documents include:
- The Plan must encompass the requirements of the Government's Revised National Planning Policy Framework (NPPF) (2018), and supporting PPG.
- Regard has to be given to the Marine Policy Statement and the associated adopted South Marine Plan (2018) which provide the framework for decisions affecting the marine environment.

- The Coastal West Sussex and Greater Brighton Local Strategic Statements (2016), produced by the Coastal West Sussex authorities including Brighton & Hove, sets out the long term strategic objectives and spatial priorities for the coastal authorities to be addressed through a coordinated approach across the area in terms of planning and investment.
- Adur & Worthing Growth Deal 2017-2022 signed by Worthing Borough Council and West Sussex County Council which sets a number of priority projects that both Councils are committed to delivering in partnership.
- Worthing Town Centre Investment Prospectus sets out a broad vision for the town centre and set out an ambition for Worthing to "be recognised as a highly desirable place to live, work and visit.
- Worthing Seafront Investment Plan 2017 provides a clear focus on securing investment to deliver an ambitious vision and series of transformational projects designed to complement and enhance the regeneration of the town centre and support delivery of key sites set out in the Investment Prospectus. The Seafront Investment Plan also takes into account early design proposals emerging from the Worthing Public Realm Options Appraisal Study (2017).

Local Plan Vision and Objectives

2.2.6 The Vision for the Draft Local Plan sets out what kind of town Worthing aspires to be by 2033. It responds to local challenges and opportunities, is evidence based and takes account of community derived objectives.

V1. By 2033 Worthing will be recognised as a highly desirable place to live, work and visit, continuing to attract high calibre businesses and significant inward investment that will help the town's economy to grow and improve its regional competitiveness.

V2. Regeneration of the town centre and seafront will have built on recent successes to unlock key development sites and deliver a vibrant and diverse retail, cultural and leisure offer for residents and visitors of all ages.

V3. Limited land resources will have been developed in the most efficient way to maximise the delivery of the widest range of identified needs, whilst at the same time ensuring that the Borough's environment, intrinsic character and its coastal and countryside setting have been protected and enhanced.

V4. High quality new development will have been integrated with existing communities and opportunities taken to deliver new and improved facilities and services.

2.2.7 The Strategic Objectives, link to the Vision and the three key roles for the planning system set out in the revised NPPF. The Objectives provide the direction for the spatial strategy and policies for the plan area.

SOCIAL - The Local Plan will:

SO1 Deliver high quality new homes that best reflect the identified needs within the borough (in terms of size, type and tenure).

SO2 Ensure that developments provide an appropriate level of affordable housing to help those in housing need.

SO3 Improve accessibility to services, local centres and the town by sustainable modes of transport, reducing the need to travel by car.

SO4 Ensure that there is sufficient infrastructure capacity to meet existing needs and the needs arising from new development.

SO5 Safeguard existing dwellings and the character and amenity of residential areas.

SO6 Ensure new development integrates into existing communities, supporting local centres to enhance well-being of all people, and reduce inequalities.

SO7 Encourage the creation of healthy environments, improve opportunities to access the natural environment and support healthy and active lifestyles.

ECONOMY - The Local Plan will:

SO8 Retain and enhance key employment areas and provide a choice of employment sites to meet the needs of existing and future businesses.

SO9 Strengthen Worthing's town centre as a location for shopping and business and enhance its role as a sub-regional centre.

SO10 Encourage family friendly and evening economies and improve the retail, cultural and leisure offer in the town centre through the improvement of existing areas, the delivery of new developments and improved connectivity.

SO11 Enhance the gateway approaches and key transport corridors leading into the town centre.

SO12 Support Worthing's tourism role through the provision of additional high quality tourism facilities.

SO13 Deliver high quality public realm and enhanced infrastructure to attract inward investment.

SO14 Seek to improve the skills of the workforce and quality of the environment to encourage the creation of high value jobs by existing and new businesses.

ENVIRONMENT - The Local Plan will:

SO15 Protect, and where possible enhance, valued green spaces, stretches of undeveloped coastline and the quality of the natural environment.

SO16 Improve the quality of the natural environment and public realm within the town centre and along the seafront.

SO17 Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.

SO18 Protect, maintain and enhance the distinct character, heritage, identity and setting of the borough.

SO19 Ensure development mitigates the impact of, and helps the borough to adapt to, the effects of climate change, now and in the future.

SO20 Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion and promote active travel.

What is the Local Plan not trying to achieve?

2.2.8 It should be noted this Plan does not cover matters relating to minerals and waste as this is the responsibility of West Sussex County Council. The County Council is also responsible for all roads and transport planning in West Sussex except for the trunk roads (A24 / A27 / A264) which are the responsibility of Highways England.

2.2.9 It is important to emphasise that the Plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking i.e. a process that omits consideration of detailed issues in the knowledge that these can be addressed further down the line through the planning application process. The strategic nature of the Plan is reflected in the scope of the SA.

2.3 What is the sustainability context?

2.3.1 An important step when seeking to establish the appropriate scope of an SA involves reviewing context messages in relation to broad problems / issues and objectives. The Local Plan SA Scoping Report (2015) presented a full review of the relevant Plans, Policies, Programmes, Strategies and Initiatives (PPPSIs) and identified key messages. An updated summary of key context messages is presented below.

Environmental Context

2.3.2 To limit air pollution, the EU adopted the Clean Air Policy Package which includes a Clean Air Programme for Europe which sets new objectives for air policy for 2020 and 2030. This is achieved through Directive 2016/2284/EU on the reduction of national emissions of certain atmospheric pollutants which sets national reduction commitments for five pollutants. Nationally, the Air Quality Plan for Nitrogen Dioxide in UK (2017) sets out how the UK will be reducing roadside nitrogen dioxide concentrations. The 25 Year Environment Plan (2018) sets out goals and targets to achieve clean air through reducing emissions, ending the sale of petrol and diesel cars and vans, and maintaining continuous improvement in industrial emissions. The revised NPPF suggests that planning policies should contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs), and the cumulative impacts from individual sites. Opportunities to improve air quality should be identified and considered at the plan-making stage. The Environment Act 1995 and the Air Quality Regulations as amended (2002) require Local Authorities to assess air quality and where necessary declare AQMAs and produce Air Quality Action Plans. The Worthing Air Quality Action Plan (2015) details necessary steps to improve air quality within the identified AQMA. The Sussex Air Quality and Emissions Mitigation Guidance (2013) was developed by members of the Sussex Air Quality Partnership (Sussex-air). The guidance supports the principles of the partnership to improve air quality across Sussex and encourage emissions reductions to improve the environment and health of the population. Breathing Better: a partnership approach to improving air quality in West Sussex (2018) details the approach in West Sussex to tackling air pollution and improving air quality. The document details actions that are being undertaken by the District and

Borough Councils and proposes an 'Inter-authority Air Quality Group' to develop and deliver actions designed to improve air quality in West Sussex.

2.3.3 **Noise** is an issue that is related to air quality, given that problems are driven by traffic and industrial operations. Noise guidance provided by the World Health Organization states that "general daytime outdoor noise levels of less than 55 decibels adjusted (dBa) are desirable to prevent any significant community annoyance." The Noise Policy Statement for England (2010) addresses the effective management and control of environmental noise, neighbour and neighbourhood noise to be considered alongside other relevant sustainable development issues at the appropriate time. The Noise Action Plan: Agglomerations (2014) includes Brighton which Worthing is locating within. This addresses the management of noise issues arising from road, railway, aviation and industrial sources, setting long term strategies to manage noise and its impacts, while safeguarding quieter areas of the agglomeration.

2.3.4 The need to minimise travel and identify opportunities to promote walking, cycling and public transport are emphasised by the revised NPPF. Locally the West Sussex Transport Plan 2011-2026 sets out to increase the use of sustainable modes of **transport**, improve network efficiency in order to reduce emissions and delays, minimise the impact of HGVs on the local community, improve safety for all road users and reduce traffic emissions.

2.3.5 Protection and enhancement of **biodiversity** is promoted through several pieces of EU legislation, which include The Habitats Directive 92/43/EEC on the conservation of natural habitats and of wild **fauna and flora**, which established a suite of designated sites and introduced the precautionary principle; and The Birds Directive 2009/147/EC. The importance is further emphasised by the EU Biodiversity Strategy (2011), which aims to halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'. Within England, the Wildlife and Countryside Act (1981 as amended) is the main piece of legislation relating to nature conservation. The most recent England biodiversity strategy 'Biodiversity 2020 (2011) builds on the Natural Environment White Paper for England and provides a picture of how England is implementing its international and EU commitments. The 25 Year Environment Plan (2018) includes commitments to achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife and enhance biosecurity. The revised NPPF states planning policies and decisions should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. At a local level the Sussex Biodiversity Action Plan (2010) (BAP) identifies species and habitats most under threat, and sets out an agenda for action.

2.3.6 The Climate Change Act 2008 provides a framework to cut UK greenhouse gas emissions and build the UK's ability to adapt to the changing **climate**. The latest UK Climate Change Risk Assessment (2017) outlines the Governments' views on the key climate change risks and opportunities that the UK faces. It endorses six priority areas: flooding and coastal change, high temperatures, water shortages, risks to natural capital, food production and trade, pests, diseases and invasive non-native species. The UK Government's Clean Growth Strategy (2017) includes policies and proposals to accelerate the pace of clean growth i.e. increased economic growth and decreased emissions. The 25 Year Environment Plan (2018) includes a commitment to take all possible action to mitigate climate change while adapting to reduce its impact. The objective of promoting energy efficiency and renewable energy production has been the focus of EU legislation including EU Directive 2009/28/EC on the promotion of use of energy from renewable sources and the EU Directive 2010/31/EC on the energy performance of buildings. The revised NPPF highlights the important role planning can have in mitigating climate change by reducing greenhouse gas emissions from new developments and increasing the use and supply of renewable and low carbon energy. Locally the West Sussex Sustainability Strategy 2015-2019 and Action Plan identify four priority areas: embed sustainability within our business, valuing West Sussex, energy savings, and maximising benefits.

2.3.7 The avoidance and reduction of **flood risk** is championed by the EU Floods Directive 2007/60/EC. This requires Member States to asses all water courses and coastlines for risk and to plan adequate measures to reduce the risk. The revised NPPF directs development away from areas at highest flood risk and ensures where development is necessary in such areas, that it should be made safe for its lifetime without increasing flood risk elsewhere. The River Adur Catchment Flood Management Plan (2009) identifies long-term policies for managing flood risks from the river over the next 100 years. The Beachy Head to Selsey Bill Shoreline Management Plan (2006) considers flooding from the sea. The Rivers Arun to Adur Flood and Erosion Management Strategy (2010) aims to establish a sustainable policy for the management of coastal defences between the Rivers Arun and Adur over a 50 year period. The Flood and Water Management Act (2010) required County Councils to lead the coordination of flood risk. As the Lead Local Flood Authority (LLFA), West Sussex County Council produced a Local Flood Risk Management Strategy (2013) which outlines the risks from flooding and their responsibilities in managing that risk. West Sussex LLFA has also developed their own policy for the management of surface water.

2.3.8 The protection and enhancement of **water** quality and quantity is driven by the Water Framework Directive (WFD) (2000/60/EC), which requires a catchment-based approach to water management. The Framework Directive applies to coastal, transitional, surface water bodies and groundwater. It requires the achievement of 'good status' by an assigned deadline and no deterioration. The South East River Basin Management Plan (2015) provides a framework for protecting and enhancing the benefits provided by the water environment. It sets out how organisations, stakeholders and communities will work together to improve the water environment. The Bathing Water Directive (2006/7/EC) protects public health while offering an opportunity to improve management practices at bathing waters through an information dissemination classification system for the public with more stringent water quality standards. The directive aims to ensure all bathing waters meet a good mandatory standard. At the national level, the revised NPPF requires that planning decisions prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by pollution. The NPPF also expects developments to incorporate Sustainable Drainage Systems. The 25 Year Environment Plan (2018) includes a goal to achieve clean and plentiful water by improving at least three quarters of our waters to be close to their natural state as soon as is practicable. At a local level, the Arun and Western Streams Abstraction Licensing Strategy (2013) sets out how water resources are managed.

2.3.9 The European Thematic Strategy for Soil Protection (2006) seeks to protect and where contaminated, restore **soils**. In Safeguarding our Soils: A strategy for England (2009) preventing the pollution of soils and addressing the historic legacy of contaminated land is addressed, recognising that changing demands on our soils need to be better understood ensuring that 'appropriate consideration is given to soils in the planning process'. The revised NPPF calls upon the planning system to protect and enhance soils.

2.3.10 The European Landscape Convention (ELC) was the first international treaty to be exclusively devoted to all aspects of European **landscape** and covers both rural and urban areas. The ELC came into force in the UK in March 2007. It defines landscape as: "An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." It recognises that the quality of all landscapes matters – not just those designated as 'best' or 'most valued'. The revised NPPF refers to the need to protect and enhance valued landscapes and maintaining the character of the undeveloped coast. The 25 Year Environment Plan (2018) includes a goal to conserve and enhance the beauty of our natural environment by safeguarding and enhancing the beauty of our natural scenery. The South Downs National Park Partnership Management Plan

(2013) sets out an overarching 5 year strategy for the management of the National Park.

2.3.11 The Heritage Statement (2017) sets out the Government's vision and strategy for **heritage** and the historic environment. The Planning (Listed Buildings and Conservation Areas) Act 1990 relates to Listed Buildings and introduces Conservation Areas. The Ancient Monuments and Archaeological Areas Act 1979 make provision for the investigation, preservation and recording of matters of archaeological or historical interest. The revised NPPF establishes a need to set out a 'positive strategy' for the conservation and enjoyment of the historic environment, including those heritage assets that are most at risk. It is the Government's overarching aim that the historic environment and its heritage assets should be conserved for the quality of life they bring to this and future generations. The Culture White Paper (2016) recognises our historic built environment as a unique asset and has an overarching desire to give access for everyone to England's rich heritage in all its forms, recognising the role that culture plays in supporting jobs, skills, tourism and community identity and well-being. The Adur & Worthing Cultural Strategy (2016) sets a series of goals and priorities.

2.3.12 The EU Waste Framework Directive 2008/98/EC requires that the **waste** hierarchy is observed and is a material consideration in determining individual planning applications. The Government Review of Waste Policy in England also contains actions and commitments for keys actors, which includes local authorities, to work towards a zero waste economy. The West Sussex Waste Local Plan (2014) includes an aspiration to achieve zero waste to landfill by 2031. The 25 Year Environment Plan (2018) includes a commitment to minimise waste and reuse **materials** as much as we can and it also includes a goal to ensure that resources from nature such as food, fish and timber are used more sustainably and efficiently.

Socio-Economic Context

2.3.13 **Social inclusion** is promoted in the EU through the renewed European Sustainable Development Strategy (2006) and is considered one of the seven key challenges for the EU within the strategy. Within the revised NPPF, paragraph 8 sets out that the planning system has an overarching social objective which is: to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. The Integrated Communities Strategy Green Paper (2018) sets out the Government's vision for building strong integrated

communities. The revised NPPF also emphasises the need to: facilitate social interaction and create healthy, inclusive communities; promote retention and development of community services and facilities; ensure access to high quality open spaces and opportunities for sport and recreation; and promote vibrant town centres.

2.3.14 The revised NPPF outlines the social role the planning system plays in supporting the **health** & well-being of **communities** through the promotion and retention of community services, the setting of strategic policy to deliver health facilities, and providing access to high quality open spaces and opportunities for sport and recreation. A key message of the revised NPPF is to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. The Marmot Review Fair Society, Healthy Lives (2010) sets key policy actions that fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality. Locally the West Sussex Sustainable Community Strategy for 2008-2020 highlights essential areas for improvement which include reducing West Sussex's contribution to climate change, improving access to high quality education, reducing the difference in life expectancy between different demographics and increasing safety in West Sussex. The Sustainable Community Strategy for Worthing & Adur 2010-2026 is set around four priorities for change, which reflect the evidence and the views and needs of residents in Adur and Worthing, namely a better place to live, work and enjoy; better health and well-being for all; Learning, training and employment opportunities for all; and staying and feeling safe. The Adur and Worthing Council's Public Health Strategy 2018-2021 highlights significant health challenges including higher than average levels of obesity and alcohol misuse; low rates of physical activity; isolated older people and loneliness of all ages; early deaths from cancers; high incidence of mental health issues amongst our young people and low educational attainment. It sets out 5 priorities for enabling the better health and well-being of its communities:

- We all have the opportunity to enjoy good mental well-being and emotional resilience (at all life stages)
- We contribute to improved environmental sustainability
- We can all access and make positive use of our open spaces
- We all have the opportunity to enjoy a healthy lifestyle (diet, weight, smoking, physical activity, alcohol, drugs and sexual health)
- We can all enjoy good social connections via purposeful activity at all stages of our life.

2.3.15 The white paper "Fixing our broken **housing** market" (2017) prompted a wide range of reforms to the planning system including the Housing Delivery Test

to assess whether councils are delivering the homes they need. The revised NPPF seeks to ensure a wide choice of high quality homes, with more opportunities for home ownership. There is a need to plan for a mix of housing based on the local demography and the needs of the different groups within the local community. The NPPF recognises that larger developments are sometimes the best means of achieving a supply of new homes. It also acknowledges that small sites make a valuable contribution to housing supply. The Adur and Worthing Housing Strategy (2017-2020) sets out the Councils' housing priorities for the next five years and dovetails with the Councils' corporate priorities, other Council strategies and the strategies and priorities of other partners and stakeholders.

2.3.16 The Government's white paper: Industrial Strategy (2017) sets out a long-term plan to boost the productivity and earning power of people throughout the UK. The revised NPPF requires planning policies to positively and proactively encourage sustainable economic growth. Coastal West Sussex Economic Plan (2016-2020) sets out ambitions for the Coastal West Sussex **economy** and identifies actions that the Coastal West Sussex Partnership will take. The Adur & Worthing Economic Strategy (2018-2023) sets out ambitious plans for how the place will achieve "good growth". The Strategy identifies a small yet focused set of priorities where by working with partners, value can be added to make a real difference to the area's economic performance.

2.4 What is the sustainability baseline?

The SA Report must include:
- Relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan;
- Characteristics of areas / populations etc. likely to be significantly affected; and
- Existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

2.4.1 The baseline review is about tailoring and developing the problems/issues identified through context review so that they are locally specific. A detailed understanding of the baseline can aid the identification and evaluation of 'likely significant effects' associated with the Plan / alternatives.

2.4.2 The Worthing Local Plan SA Scoping Report (2015) presents a detailed review and key messages are presented below, updated to refer to the most recently available data. The full Baseline Review can be found in the Scoping Report.

Introduction to the area

2.4.3 Worthing originally developed as a popular Victorian and Edwardian seaside resort from 1780 onwards. The surrounding medieval villages of Broadwater, Heene and West Tarring, were later engulfed by the expanding suburbs of Worthing. It is now one of the largest towns in West Sussex, with around 105,000 residents and a workplace population of approximately 55,000 people. Worthing is located on the south coast between the English Channel to the south and the South Downs National Park to the north. It is this high quality environment that helps to underpin and support the local economy and which is so valued by those who choose to live, study, work and visit here. In turn, this helps to generate an increasing requirement for homes, jobs and leisure opportunities. Worthing plays an important role within a wider sub-region with key links to other authority areas such as Adur, Arun, Brighton & Hove, Crawley and Horsham for housing, leisure and employment.

2.4.4 Much of Worthing occupies the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. It is a compact town and the built up area takes up over 2,282 hectares (68%) of the borough's geographical area (3,369 ha). The proportion of land within the current built up area increases to approximately 92% if the land that falls within the South Downs National Park (821 ha) is excluded. Whilst being principally an urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town. The seafront is one of Worthing's most important

assets acting as a focus for many of the historical buildings, gardens and public spaces that represent the Victorian seaside resort it once was. Within Worthing there are two main rivers, the Ferring Rife, towards the western boundary and the Teville Stream towards the eastern boundary which flows through the Brooklands Recreation Area both providing valuable habitat. Both rivers drain into the sea.

Baseline

Environment			
The borough is home to a number of statutory and non-statutory nature conservation designations including 11 Local Wildlife Sites and Cissbury Ring (located within the National Park) which is a Site of Special Scientific Interest.	Within the borough there are 26 Conservation Areas; 9 Environmental Areas of Special Character and 360+ listed buildings. Of these Holy Trinity Church, Shelley Road and Castle Goring (within the National Park) are on the Heritage at Risk Register.	There are over 360 hectares of parks and open recreation spaces within the borough including Highdown Gardens (Registered as a Historic Park & Garden) and 10 Parks & Gardens registered as having local historic interest.	The West Sussex Local Flood Risk Management Strategy recognises Worthing as a priority 'Wet Spot' with 8,750 properties at surface water flood risk, 1,350 properties at river and sea flood risk and 300 properties at combined flood risk.
Air quality is generally good, but an Air Quality Management Area (AQMA) is in operation on the A27 (Upper Brighton Road) where most of the air pollution is generated by traffic. This was extended in 2014.	The Ferring Rife is classed as 'good' status, however the Teville Stream is heavily urbanised and currently classified as 'bad' status. Bathing water is classed by the Environment Agency as being 'good' quality.	There are significant groundwater resources in the north of the borough used for public drinking water supply. Worthing is in an area of serious water stress defined as 'water not available for licensing' and no new consumptive licenses will therefore be permitted.	The extensive chalk downlands, much of which falls within the South Downs National Park, are essential to the health of the town, in terms of its water supply, biodiversity, and opportunities for leisure and recreation.
To the east and west of the borough, areas of valuable open countryside form long established breaks in development between settlements. These are graded as the Best and Most Versatile Agricultural Land.	In 2016/17, 35.3% of household waste collected was sent for reuse, recycling or composting compared to 44.3% across West Sussex.	Important fisheries are located off the south coast between Shoreham and Littlehampton and a number of local fishermen regularly fish the near-shore zone in Worthing.	Located within the South Coast Plain National Character Area. The 7.5km of shoreline is home to a wide variety of flora and fauna and provides a great attraction for visitors and residents.

SOCIAL			
Population has risen over recent decades and is expected to continue to do so during the Plan period. There has been a 7.1% population increase between 2001 (97,600) and 2011 (104,600).	There are significant disparities within different areas of the town and three wards in Worthing (Heene, Central and Northbrook) fall within the lowest 20% of areas in England (using indicators of deprivation and educational attainment).	Population growth is largely driven by domestic migration with the majority of movements being from Adur and Brighton & Hove.	The percentage of the population in the over-75 age group is significantly higher than the South East region. However, the town has seen a relative decline in its 65+ year population over the last 20 years.
In May 2017 there were 1,277 households on the Housing Register. This very high level of affordable housing need is further evidenced within the Worthing Housing Study (2015) which calculates an affordable housing need of 435 dwellings per annum.	In 2017 average house prices were 11.35 times median earnings which is well above the national average - this has put home ownership beyond the reach of many households	The English Indices of Deprivation 2015 ranks Worthing 174th out of 326 local authorities.	Average life expectancy is 79.1 years which is slightly lower than the South East but higher than the England average. There is a stark difference (8.1 years) between the wards in Worthing with the highest and lowest life expectancy.
Between 2006 and 2017 a total of 3,141 new homes were built in the borough.	The percentage of obese adults is higher than the England average with physical activity of adults being slightly lower than average.	Worthing has a total stock of 50,000 homes (2017). The majority (90%) of the stock is in private sector ownership, which is slightly above the Coastal West Sussex average. 10% of the stock is owned by Registered Providers. There is no local authority owned stock.	Residents from minority ethnic groups make up a relatively small, but important proportion of the Worthing's population. However, central areas have a significant number of residents from other EU countries.

Economy			
Public transport services in the town are relatively good. There are five railway stations	Car ownership in Worthing is slightly higher than the national average. There are	Worthing is a net exporter of labour with a net outflow of approximately 1,000	In 2016 there were an estimated 296,000 staying trips and 3.6 million day tourist trips -

in the borough.	areas of heavy road congestion, especially at peak times.	workers.	with total expenditure in the local area by visitors estimated to be £143.5m.
The labour market is characterised by low economic activity. Workplace wages are also significantly lower than resident wages suggesting the types of employment roles available locally are less well paid than elsewhere in the sub-region.	Worthing has a strong manufacturing base, as well as a significant service sector led by large public sector employers and financial firms. The business base accommodates a slightly lower proportion of small businesses and higher proportion of medium-sized businesses compared to the regional average.	Worthing has a well-defined network / hierarchy of shopping areas (town centre, district centres and local / neighbourhood centres).	Productivity (measured by Gross Value Added per workforce job) is approximately £38k which is lower than the average for the rest of the South East and the UK.
Worthing is located within the Coastal West Sussex and Brighton & Hove Functional Economic Market Area (FEMA). Worthing is part of the 'Coast to Capital' Local Enterprise Partnership (LEP) which is a public and private sector partnership that seeks to improve economic prosperity.	The town has a good supply of hotels and guesthouses which offer a variety of accommodation types and standards - in 2016 there were 9 hotels with a total of 435 bedrooms. This supply is predominantly located on, or just off, Worthing seafront.	In employment terms the largest industries in Worthing (2015) were healthcare (26%), professional services (11%), retail (10%) and education (7%).	The retail economy has weathered reasonably well since the global recession in 2008 but its primary shopping areas could be performing more strongly. Vacancy rates for retail units are below the national average but slightly above the average for West Sussex.

Limitations

2.4.5 In relation to equalities, it has not been possible to gain reliable data on sexual orientation to establish a baseline or identify trends. Supported and sheltered housing also provide an important resource for elderly and vulnerable people. At this stage it has not been possible to establish a baseline for sheltered or supported housing in Worthing.

2.5 What are the key issues and objectives?

> The SA Report must include:
> - Key problems / issues and objectives that should be a focus of / provide a framework for appraisal

2.5.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report was able to identify a range of sustainability problems / issues that should be a particular focus of SA, ensuring it remains focused.

Table 2: The Sustainability Baseline and Key Sustainability Issues

Scoping Report Topic	Key Sustainability Issues	Likely Evolution Without the Local Plan	Relevance to SEA, HIA & EqIA
Air Quality	- Poor air quality exists along the A27 and the area affected is expanding - Traffic congestion is prevalent along main road networks - Source apportionment shows that HGV's and LGV's whilst making up only 3% of traffic in the AQMA, produce over 30% of the NO2 emissions.	- Air quality objectives may not be met if development is not located in the most sustainable locations - Inappropriate development could result in additional AQMA's being declared at other locations.	SEA Topics: Biodiversity, Population, **Human Health**, Soil, Water, **Air**, Climatic Factors HIA EqIA
Biodiversity and Green Infrastructure	- There is limited open space within and around Worthing. Development pressures may further threaten the biodiversity within these areas - The links between the urban area and the South Downs to the north and coastline to the south provide valuable wildlife corridors and green infrastructure networks which will need to be protected and enhanced.	Opportunities to enhance existing habitats and improve networks and wildlife corridors could be missed without a co-ordinated approach through the Local Plan.	SEA Topics: **Biodiversity**, Human Health, Flora, Fauna, Climatic Factors
Climate Change	Climate change will lead to sea level rise and more frequent and extreme weather events. This is likely to	- Flooding is likely to increase in the future. - Development may result in an increased flood risk	SEA Topics: Biodiversity,

Adaptation and Flood Risk	result in more severe and widespread periods of drought and flood events • The areas at risk of flooding are likely to increase in the future as a result of climate change.	elsewhere if all sources of flood risk are not properly considered. • Opportunities may be missed to improve management of local flood risk through the use of Sustainable Drainage Systems (SuDS), particularly on the redevelopment of brownfield sites.	**Population**, **Human Health**, Fauna, Flora, Soil, **Water, Climatic Factors**, Material Assets, Cultural Heritage, Landscape HIA
Climate Change Mitigation and Energy	• There is a need to develop renewable energy sources, and reduce greenhouse gases • It is important that the downward trend in CO2 emissions is maintained • In 2016 the Government scrapped its commitment to zero carbon homes.	• The downward trend in CO2 emissions may not be maintained unless there is continued support and commitment to high energy efficiency standards and renewable energy schemes.	SEA Topics: Biodiversity, **Population**, Human Health, Fauna, Flora, Soil, Water, **Climatic Factors**, Material Assets, Cultural Heritage, Landscape HIA
Community and Well-being (including equality and health)	• With the largest population growth among people in their 40's and significant proportion of over 60's the ageing population will have implications for demands on health and social care • Some areas of Worthing are in the 10% most deprived in England. Educational attainment is relatively low and indicators of health show this is worsening. Inequalities relating to health, education and crime need to be	• If the population continues to increase this will need to be accommodated. Without a Local Plan in place that seeks to deliver sustainable levels of growth, development, or a lack of development, may unintentionally affect groups based on race, gender, disability, age or religion. It is also possible to assume that health inequalities may worsen	SEA Topics: Population, **Human Health** HIA EqIA

	addressed • Worthing already has a high population density and the population is continuing to increase. This could result in potential health impacts unless adequate housing, open space and community facilities are provided.	• The Local Plan can influence the wider determinants of health in relation to the environment, local economy and community that could impact on physical and mental health and help reduce health inequalities • Health and social care services and infrastructure may not keep pace with new development thus impacting on people's ability to access these services.	
Economy and Employment	• With continuing losses of office space it is important to retain key employment spaces as far as is possible • Low levels of skills and educational attainment among the population with few links to higher education institutions • There is limited space to accommodate new housing and employment space.	• Without a Local Plan in place that will consider economic needs including employment land, the pressure for housing may lead to a lack of employment land which will constrain economic growth and investment • Without the Local Plan, it is unlikely that infrastructure required to facilitate development can be coordinated and delivered.	SEA Topics: Population, **Material Assets**
Historic Environment	• Heritage assets at risk from neglect, decay, or development pressures • The need to conserve and enhance designated and non-designated heritage assets and the contribution made by their settings • Accommodating change and growth whilst sustaining and enhancing the significance of heritage assets and the valued character of a place.	• Conservation Areas and other heritage assets could be adversely affected by insensitive development.	SEA Topics: Material Assets, **Cultural Heritage**, Landscape
Housing	• There is a continued need to provide housing to meet the needs of existing and future residents at a reasonable price • The housing stock comprises of a high proportion of flats but demand is for houses • The demand for housing through the housing register continues to exceed supply.	• Without a Local Plan in place the right mix and tenure or sufficient level of new homes may not be provided. This would potentially have further economic and social effects.	SEA Topics: **Population**, Human Health, Material Assets HIA EqIA

Landscape	• The need to maintain and enhance the high quality natural landscape • The need to conserve and enhance the character and setting of Worthing's urban areas and its relationship with the coast and SDNP.	• Unplanned development may unintentionally adversely affect the local landscape character of Worthing.	SEA Topics: Biodiversity, Fauna, Flora, Soil, **Material Assets**, **Landscape**
Soils	• Previous focus on brownfield sites means there are a limited number of opportunities remaining to meet housing need on brownfield sites as evidenced in the Council's most recent Strategic Housing Land Availability Assessment (Update – December 2017). • There are areas of high quality Grade 1 Agricultural Land on Greenfield sites around Worthing. This is an important resource for food production that should be recognised and protected in favour of lower quality land • There are significant areas of contaminated land along the eastern boundary.	• The current Worthing Core Strategy (2011) focuses on the regeneration of brownfield sites which is likely to result in remediation of contaminated land in some areas. • As development pressures increase, the consideration of development on Greenfield sites may impact high grade agricultural land.	SEA Topics: Biodiversity, Human Health, Fauna, Flora, **Soil**, Water
Transport	• Road congestion during peak periods affects many parts of the highway network throughout Worthing, disrupting journey times and causing poor air quality. Particular problems are on main routes into the town centre (A259 and A24) and along the A27 • The current provision of pedestrian and cycling facilities across the town could be improved to help support and maintain sustainable travel • The current rail services are also at capacity during peak times.	• Road congestion is likely to worsen without improvements affecting residents, businesses, visitors and commuters.	SEA Topics: Population, **Human Health**, **Air**, Climatic Factors HIA EqIA
Waste	• The reuse of building materials should be promoted to reduce the amount of construction waste generated • There has been a decrease in the recycling rate. Improvements are needed and measures to promote recycling encouraged to reduce the proportion of waste	• Rates of recycling have been decreasing. This is likely to continue unless measures are put in place to reverse this trend. Without mitigation measures, there is likely to be increased waste generated as a result of an increasing population and related	SEA Topics: Population, **Climatic Factors** Landscape

	• sent to landfill • It will be important to reduce the amount of waste produced to avoid further amounts sent to landfill as a result of population growth.	housing and employment growth.	
Water	• There is already a shortage of water resources which is impacting on the local ground and surface waters. This is likely to worsen as a result of further growth • Vital groundwater supplies, coastal bathing waters and rivers are vulnerable to pollution and failing to reach quality targets.	• The requirements of WFD and Catchment Plans already in place are likely to result in an improvement in water quality. However this relies on work with partners and stakeholder including Local Authorities. Without the Local Plan some opportunities may be lost.	SEA Topics: Biodiversity, **Population**, Human Health, Fauna, Flora, Soil, **Water**, Climatic Factors

2.5.2   The issues identified above were then refined further into a more discrete list of sustainability objectives. The following is a list of sustainability objectives that reflects the sustainability issues established through the context and baseline review. The list of objectives provides a methodological framework for appraisal, ensuring it remains focused and concise. The objectives were identified at Scoping Stage, however these have been reviewed in light of the comments received and following advice from the Planning Advisory Service (PAS) to ensure they remain relevant, effective and consistent with national policy changes.

Table 3: Integrated Impact Assessment Framework

IIA Objective		Relevance to Scoping Report Theme	Supporting Criteria *Will the site/policy proposal under consideration…*	Commentary	Relevance to SEA, HIA & EqIA
1. Environmental Quality	To protect and improve air and water quality and reduce pollution.	Air Quality Water	• Contribute to achieving good ecological status or potential as a requirement under WFD? • Ensure there is adequate capacity in water and wastewater infrastructure? • Minimise health risks associated with pollution? • Improve local air quality, especially in AQMAs?	In some areas measures show pockets of poor air and water quality. This has been attributed to historic management, land uses and traffic congestion. It is important that these resources are protected and opportunities taken to improve their quality as part of development. There is one AQMA in Worthing which has recently been expanded to cover a wider area.	SEA Topics: Biodiversity, Population, Human Health, Soil, **Water**, **Air**, Climatic Factors HIA EqIA
2. Biodiversity	To conserve, protect and enhance habitats and natural species diversity, green infrastructure networks and wildlife corridors.	Biodiversity and Green Infrastructure	• Achieve a net gain in biodiversity locally? • Ensure no net loss of Priority Habitat? • Deliver opportunities to protect, restore or enhance biodiversity? • Promote the connectivity of habitats as part of an ecological network?	There is limited space available in Worthing to provide habitats. This means even smaller sites with biodiversity and the networks of wildlife corridors which provide connectivity are highly valued.	SEA Topics: **Biodiversity,** Fauna, Flora, Climatic Factors

3. Land and Soils	Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials.	Soils	• Direct development to brownfield sites before Greenfield? • Support remediation of contamination as part of the redevelopment of brownfield sites? • Protect agricultural and best and most versatile soil? • Will it encourage the re-use of buildings? • Will it help to reduce the number of vacant / derelict buildings?	The limited space available in Worthing for development means a range of sites and options will need to be considered. Previously undeveloped land and high quality agricultural soils are finite resources.	SEA Topics: **Soil,** Material Assets, Landscape
4. Energy	To manage energy use, contributing to climate change mitigation.	Climate Change Mitigation and Energy	• Improve sustainability of buildings? • Increase the amount of energy from renewable and low carbon technologies? • Will it improve insulation, internal air quality and energy efficiency in existing housing to reduce fuel poverty? • Promote recycling, reuse and reduction of materials to reduce the levels of waste to landfill? • Will it help reduce greenhouse gas emissions? • Will it help reduce dependency on non-renewable energy sources? • Will it encourage and improve efficient use of energy?	Further growth and development is likely to cause increased emissions and waste, contributing to climate change unless mitigated. As one of the greatest sources of greenhouse gas emissions in the borough are from road transport there are clear links between this and the 'travel and access' objective which aims to reduce car use.	SEA Topics: Biodiversity, Population, Human Health, Fauna, Flora, Soil, Water, Air, **Climatic Factors,** Material Assets, Cultural Heritage, Landscape HIA EqIA
5. Water Management	To ensure water is effectively managed to adapt to the effects of climate change.	Water Climate Change Adaptation and Flood Risk	• Reduce demand for water? • Promote the use of Sustainable Drainage Systems (SuDS)? • Direct development to areas of lowest flood risk? • Will it safely manage and reduce	Climate change will result in more extreme weather events including more frequent and severe floods and droughts. The baseline data shows that parts of Worthing are already at risk of flooding from a variety of sources.	SEA Topics: Biodiversity, Population, Human Health, Fauna, Flora, Soil, Water,

			the risk of flooding? • Will it safeguard groundwater resources? • Will it minimise the impacts of climate change on health and well-being, particularly on vulnerable groups?	There are links between these and the 'environmental quality' objective regarding water quality.	Material Assets HIA EqIA
6. Landscape and Character	To protect and enhance landscape, the quality, character and appearance of the landscape, maintaining and strengthening local distinctiveness and sense of place.	Landscape	• Conserve and enhance the character and quality of natural landscapes, countryside and coast? • Protect and enhance the setting to the South Downs National Park? • Respect existing settlement patterns and maintains separation between settlements? • Will any new development be appropriately integrated with existing development and the surrounding environment?	The importance of and protecting and enhancing local landscapes particularly in relation to the SDNP and coastline has been identified. It is recognised that there will be links between this, the 'built environment' 'historic environment' and 'biodiversity' objectives.	SEA Topics: Biodiversity, Fauna, Flora, Soil, Material Assets, Cultural Heritage, **Landscape**
7. Built Environment	To protect the built character of the townscape and secure the delivery of high quality design.	Historic Environment Landscape	• Promote high quality urban design? • Protect and enhance the character and local distinctiveness of townscapes? • Ensure integration of new development with their surrounding context? • Will it enhance and promote the perceived sense of place? • Will it enhance the quality of the public realm?	This is likely to be a key issue in Worthing as the limited amount of land is likely to result in brownfield development within existing towns and settlements. Creating a high quality built environment can also help contribute to the achievement of economic objectives. There are links between this and the 'historic environment', 'crime and public safety' and 'communities' objectives.	SEA Topics: Population, Human Health; Material Assets, **Cultural Heritage**, Landscape HIA EqIA

8. Historic Environment	To preserve and enhance the historic environment.	Historic Environment	• Will it conserve or enhance heritage assets (including designated and locally important assets) and their setting? • Will it promote the sensitive re-use of historic or culturally important buildings where appropriate?	The historic environment is also an important component of the character of the built environment. Historic England advises that a specific objective for the preservation and enhancement of the historic environment will always be necessary.	SEA Topics: Material Assets, **Cultural Heritage**, Landscape
9. Healthy Lifestyles	To help people live healthier lifestyles and reduce inequalities through physical activity and maximise health and well-being.	Community and Well-being (including equality and health)	• Promote active travel by improving access to footpaths and cycle routes? • Provide opportunities for play, sport and recreation? • Promote access to healthier foods / allotments / food growing? • Will it increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities? • Will it improve the quantity and quality of publicly accessible open space?	Pockets of Worthing suffer with deprivation in relation to health. In these areas life expectancy is relatively shorter and linked to a range of poorer health behaviours and outcomes including obesity. Health is a cross cutting issue and several other objectives also separately address determinants of health.	SEA Topics: **Population**, **Human Health** HIA EqIA
10. Crime and Public Safety	To create safe sustainable environments which promote social cohesion, security and reduce fear of crime.	Community and Well-being (including equality and health)	• Promote sustainable mixed use environments? • Improve road safety for all users? • Ensure sites are designed in a way to promote natural surveillance? • Will it reduce levels of crime, the fear of crime and anti-social behaviour?	Worthing generally has a low crime rate however anti social behaviour is a key issue particularly in wards with higher levels of deprivation.	SEA Topics: **Population**, **Human Health** HIA EqIA
11. Housing	To provide high quality, homes for all (including affordable),	Housing	• Support increased dwelling completions to meet the local need? • Does it provide high quality homes	There is significant need for housing in Worthing. It is important that the housing proposed meets the local need in terms of mix and affordability.	SEA Topics: **Population,** Human Health, Material Assets

	which includes a range of size, types and tenures that are appropriate to local needs?		within an attractive environment? • Deliver a mix of housing to meet identified needs of key local groups including Gypsies and Travellers? • Will it increase the supply of affordable housing? • Will it reduce homelessness? • Will it provide adaptable homes for independent living for older and disabled people? • Will it provide homes that meet the needs of older people including extra care etc?		HIA EqIA
12. Communities	To create and support sustainable vibrant communities where people enjoy living and to ensure equitable outcomes for all particularly those most at risk of experiencing discrimination, poverty and social exclusion.	Community and Well-being (including equality and health)	• Provide key services and facilities? • Encourage provision of well-designed public spaces? • Create communities that are adaptable to the needs of an increasingly elderly population including dementia friendly development? • Ensure infrastructure has sufficient capacity to support new communities? • Will it help reduce social inequality, poverty and social exclusion in communities in the area? • Will it help reduce deprivation? • Will it promote accessibility for those who are elderly or disabled? • How will different groups of people be affected including BME, women, disabled, LGBT, older people, young people, and faith groups? Will it benefit the groups listed above?	It is important that neighbourhood communities are created and supported through the provision of social as well as physical infrastructure. Good design is recognised as key in creating inclusive developments.	SEA Topics: **Population**, **Human Health** HIA EqIA

13. Education	Raise educational achievement and skills levels to enable current and future residents to remain in work, and access good quality jobs.	Economy and Employment	• Improve accessibility to existing educational facilities? • Facilitate the provision of new high quality educational facilities? • Ensure adequate provision of skills/training facilities?	There is relatively low educational attainment and skills in Worthing. It is important that residents of all ages and abilities can fulfil their potential and have the skills needed to fulfil their own objectives and secure employment. There are clear links between this and the 'economy' objective.	SEA Topics: **Population**, Human Health HIA EqIA
14. Economy	To attract and sustain inward investment and support sustainable growth of industry to improve the resilience and diversity of the local economy.	Economy and Employment	• Facilitate a sustainable visitor economy? • Provide space for new businesses and to enable the expansion of existing? • Increase the number, variety and quality of employment opportunities? • Facilitate the provision of good quality infrastructure to promote economic growth?	Economic growth is a key priority of the Council. There is currently a strong service sector and visitor economy. A large number of companies in Worthing are micro businesses. It is important that these are supported and appropriate employment space is available for expansion.	SEA Topics: **Population**, Human Health; **Material Assets** HIA EqIA
15. Town and Local Centres	Improve the range, quality and accessibility of wider town centre uses, and ensure the vitality and viability of existing centres.	Economy and Employment	• Provide new or improved leisure, recreational, or cultural activities? • Maintain or increase the amount of floorspace provided for 'town centre uses' within town centres? • Protect key retail areas? • Facilitate regeneration?	Worthing has clearly defined town, district and local centres. It will be important that redevelopment promotes the vitality and viability of existing centre(s) and maintains the balance between these.	SEA Topics: Population, Cultural Heritage
16. Travel and Access	Improve access to and from sustainable	Transport	• Increase non-car accessibility to existing services/facilities? • Improve public transport links?	The Local Plan can have a strong influence on sustainable development by directing and managing development in	SEA Topics: Population, Human Health,

| | modes of transport. | | • Promote accessibility and safe local routes for pedestrians and cyclists?
• Ensure streets are designed to be safe functional and accessible for all?
• Will it integrate with existing transport networks?
• Will it help improve road safety? | a way so that it increases non-car accessibility and improves access to public transport. Securing non-car access to development can have multiple secondary sustainability benefit, for instance relating to air quality, noise, built environment, as well as supporting the economy and as part of a healthy lifestyle. | **Air, Climatic Factors,** Material Assets

HIA

EqIA |

2.5.3 The compatibility of the objectives was originally published in the SA Scoping Report, March 2015. The compatibility of the revised objectives has been re-tested in the matrix below to identify any conflicts using the following key:

√ (green)	Objectives are compatible
X (red)	Potential for conflict between objectives
Blank	Neutral compatibility
? (amber)	Uncertain

Table 4: Compatibility of Objectives

Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1 Env. Quality																
2 Biodiversity	√															
3 Land/Soils	√	√														
4 Energy / CC mitigation	√	√	√													
5 Water / CC adaption	√	√	√	√												
6 Landscape & Character	√	√	√													
7 Built Env.			√		√	√										
8 Historic Env.			√		√	√	√									
9 Health	√	√	√				√	√								
10 Crime & Safety			√				√		√							
11 Housing	X	X	X	X	X	X	√	X	?	√						
12 Communities	√	√	√		√	√	√	√	√	√	√					
13 Education									√	√	X	√				
14 Economy	X	X	X	X	X	X	√	X	√	√	X	√	√			
15 Town & Local Centres	√	X	√	√	√		√	√	√	√	X	√		√		
16 Travel & Access	√	√		√		√	√		√	√	√	√	√	√	√	

Objectives

2.5.4 It is evident from this assessment that many objectives are compatible meaning they strengthen and support each other. The main conflicts arise between objectives which have a focus on development, such as housing (11) and economy (14) and the environmental objectives. Potential conflicts between these and other objectives are described in more detail in the table below. Potential for mitigation and opportunities are also described.

Table 5: Potential conflicts between Sustainability Appraisal Objectives

Conflicting Objectives	Comments	Mitigation/Opportunities
11 x 1	Housing delivery has potential to conflict with environmental quality as will result in an increased population which could lead to increased traffic and air pollutants, will increase demand for water thus impacting on water quality, will increase pressure on water infrastructure, and could be a source of noise and light pollution.	New housing provides the opportunity to deliver sustainable buildings which consider and reduce impacts on environmental receptors.
11 x 2	Housing delivery has potential to conflict with biodiversity as could result in loss of habitats including links between habitats, and/or species.	New housing provides the opportunity to deliver sustainable buildings which incorporate features that

			enhance biodiversity.
11 x 3	Housing delivery has potential to conflict with land and soils as could result in loss of agricultural and greenfield land to housing.		New housing provides the opportunity to incorporate food growing space and incorporate greenfield features, such as those provided by ecosystem services.
11 x 4	Housing delivery has potential to conflict with energy use/climate change mitigation as is likely to cause an increase in greenhouse gas emissions from domestic energy consumption.		New housing provides the opportunity to deliver energy efficient buildings.
11 x 5	Housing delivery has potential to conflict with climate change adaptation as an increased population will result in increased demand for water resources. In addition, additional building mass may contribute to increasing the urban heat island effect exacerbating the impacts of climate change and could increase the risk of flooding.		New housing provides the opportunity to incorporate water efficient design, measures that reduce flood risk and include features which ensure adaptability to climate change.
11 x 6	Housing delivery has potential to conflict with protection of the landscape character as could result in impacts on the setting of the SDNP, could result in the loss of existing separation between settlements, and could increase recreational pressure.		New housing provides the opportunity to incorporate sensitive design which considers the surrounding natural environment.
11 x 8	Housing delivery has potential to conflict with the preservation of the historic environment.		New housing provides the opportunity to incorporate sensitive design which considers the surrounding historic environment.
11 x 9	It is uncertain whether housing delivery is compatible or incompatible with healthy lifestyles. New housing could provide a range of tenure to meet local need and provide adaptable homes for independent living for older and disabled people. However, housing delivery could increase pressure on open space due to increased demand and could result in loss of open spaces to housing.		New housing provides the opportunity to incorporate features and spaces which facilitate healthy lifestyles.
11 x 13	Housing delivery has potential to conflict with education as could increase pressure on local school infrastructure.		New housing may be able to contribute to increasing school capacity through CIL/S106 agreements.
11 x14	Housing delivery has potential to conflict with economy as sites for housing could compete with sites for employment uses.		New housing will provide construction based employment opportunities, as well as lead to an increase in service sector jobs required to meet the needs of an increased population.
11 x 15	Housing delivery has potential to conflict with local/town centre uses as could increase pressure on existing facilities.		New housing may help to improve centres in decline through increased footfall. New housing may be able to contribute to increasing facilities and services through S106 agreements.
14 x 1	Economic growth has potential to conflict with environmental quality as could result in traffic and air pollutants and could be a source of noise, odour and light pollution.		New commercial development provides the opportunity to deliver sustainable buildings which consider and reduce impacts on environmental

		receptor. In addition, inward investment could support improvements to transport infrastructure.
14 x 2	Economic growth has potential to conflict with biodiversity as could result in loss of habitats including links between habitats, and/or species.	New commercial development provides the opportunity to deliver sustainable buildings which incorporate features that enhance biodiversity.
14 x 3	Economic growth has potential to conflict with land and soils as could result in loss of agricultural and greenfield land.	New commercial development provides the opportunity to incorporate greenfield features within development, e.g. infrastructure which reduces flood risk.
14 x 4	Economic growth has potential to conflict with energy use/climate change mitigation as is likely to cause an increase in greenhouse gas emissions from energy consumption and transport movements.	New commercial development provides the opportunity to deliver energy efficient buildings.
14 x 5	Economic growth has potential to conflict with climate change adaptation as could result in increased demand for water resources. In addition, additional building mass may contribute to increasing the urban heat island effect exacerbating the impacts of climate change and could increase the risk of flooding.	New commercial development provides the opportunity to incorporate SUDS and include features which ensure adaptability to climate change. In addition, inward investment could support improvements to infrastructure which reduces flood risk.
14 x 6	Economic growth has potential to conflict with protection of the landscape character as could result in impacts on the setting of the SDNP, could result in the loss of existing separation between settlements, and could increase recreational/visitor pressure.	New commercial development provides the opportunity to incorporate sensitive design which considers the surrounding natural environment.
14 x 8	Economic growth has potential to conflict with the preservation of the historic environment.	New commercial development provides the opportunity to incorporate sensitive design which considers the surrounding historic environment.
15 x 2	Provision of new facilities and an increase in town centre floorspace has potential to conflict with biodiversity as could result in loss of habitats and/or species.	New development provides the opportunity to incorporate features which enhance biodiversity.

2.5.5 Site specific criteria (Appendix C) have been developed to enable a robust process to be undertaken and ensure that each site is appraised in a consistent way. The criteria is based on the IIA Framework Objectives and seeks to provide an objective and replicable method to assessing potential sites. Where possible the IIA Framework has been adapted to provide quantitative criteria. The criteria sets out the scoring for each indicator and uses GIS, constraint mapping and findings of evidence studies to highlight the merits of each site and record the differences between sites. The sites criteria and methodology was consulted on as part of the SA Scoping Consultation and was subsequently updated to take account of comments received.

Part 3: What has Plan making involved up to this point?

> The SA Report must include:
> - An outline of the reasons for selecting the alternatives dealt with;
> - The likely significant effects on the environment associated with alternatives; and
> - An outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives are reflected in the draft plan).

3.1 A new Local Plan

3.1.1   The Worthing Core Strategy was adopted in 2011 and the intention was that it would help to guide development until 2026.   However, it must now be reviewed to reflect latest national policy, particularly with regard to how we now need to plan for housing.

3.1.2   An initial public consultation was undertaken in May 2016 titled 'Your Town – Your Future'. This consultation was the first stage in preparing the Plan. It sought views and suggestions on how Worthing should grow and develop in the future. The consultation document identified issues and challenges facing the borough and the options that could help address them. It did not state which sites it will be looking to allocate for development in the new Plan but with reference to key evidence invited views on key issues, options and opportunities. The consultation document also proposed a draft Vision and set of Strategic Objectives.

3.1.3   The responses received to the 'Your Town – Your Future' consultation indicated in general, 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.

3.2 Reasons for selecting alternatives

3.2.1   At this stage a number of evidence base studies had been produced and the findings of these informed the options presented in the 'Your Town – Your Future' consultation.

3.2.2   **Worthing Housing Study (June 2015):** Concluded that the full Objectively Assessed Need (OAN) for housing in the borough (2013-2033) is 636 dwellings per annum. This is significantly more dwellings than are currently being delivered or that are planned for in the Core Strategy. The need to balance this pressing need for development within a constrained and

environmentally sensitive borough with limited development opportunities was highlighted.

3.2.3 Given the high need identified, it was acknowledged that all realistic development options would need to be tested to assess whether they could contribute to meeting this need. To understand the capacity of the borough the Strategic Housing Land Availability Assessment (SHLAA) (2017) was used to assess the amount of land available for housing development. As part of this the Council undertook a comprehensive review of all sites in the town with the potential to deliver housing. This included those that had been promoted during a 'call for sites'. As part of this Local Plan consultation, landowners, agents and developers were reminded to submit sites to the Council at any time that they feel might be appropriate for development. As a result the consultation identified and included 10 potential sites for development within the town and 8 edge of town sites, five of which lie outside the current Built Up Area Boundary. All of these are assessed below. The SHLAA is updated and published annually as part of the Council's Annual Monitoring Report.

3.2.4 **Worthing Landscape and Ecology Study (2015):** Reviewed the edge of town sites and taking landscape, ecological and visual assessments into account the study concluded the overall suitability for development for each site. Given the need for new development a further review was then undertaken of any sites considered to have a low suitability. A further two sites identified through the 2016 Local Plan consultation were also assessed and an addendum was published in 2017. As a result of this study it was decided that based on this evidence some sites were not suitable for development and were subsequently screened out as options.

3.2.5 **Worthing Economic Research & Employment Land Review (May 2016):** Identified a demand for small scale, high quality office space in accessible locations, and a severe shortage of, and strong local demand for industrial units. The options of continuing to protect key employment areas or taking a more flexible approach were identified as part of the 'Your Town – Your Future' consultation. There was also a 'call for sites' that could accommodate employment growth.

3.2.6 Following the Local Plan consultation, further evidence studies were completed which together with the consultation responses helped to further identify and refine options.

3.2.7 **Worthing Retail & Town Centre Uses Study (2017):** Borough wide retail and commercial study to understand the current health and performance of the borough's retail and leisure offer within the existing network of town

centres and set out current and future needs for additional floorspace for the town over the Plan period to 2033. It also provides recommendations regarding the suitability of the Council's existing policy approach in respect of retail and town centre uses.

3.2.8 **Local Green Space Designation (2018):** Landscape statements drawing on the evidence from the Landscape and Ecology Study to assess the suitability of designating three sites (Brooklands, Goring Ferring Gap and Chatsmore Farm) as Local Green Space.

3.2.9 **Worthing Local Plan Transport Assessment (2018):** This report sets out the transport impacts of the options for development being tested as part of the Worthing Local Plan. The assessment proposed a broad package of measures that could be appropriate to provide an appropriate level of accessibility for each site, and further measures that address the cumulative impacts of the new development. The transport assessment has demonstrates that the proposed Worthing Local Plan would not have any significant impact on the performance of the Strategic Road Network.

3.2.10 Specifically in line with the Regulations, it is the aim of this part of the SA Report to present information on the likely significant effects associated with the alternatives and an outline of the reasons for selecting the preferred approach. As the Local Plan is at an early stage, these are reported on in Part 4 of this Draft Report.

Part 4: What are the appraisal findings at this current stage?

> The SA Report must include:
> - The likely significant effects associated with the draft plan; and
> - The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects.

4.1 Introduction

4.1.1 The aim of Part 4 is to present appraisal findings and recommendations in relation to the Draft Worthing Local Plan.

4.1.2 At the end of this chapter, conclusions of the overall sustainability of the different alternatives are provided alongside recommendations to inform the selection, refinement and publication of proposals for the Local Plan.

4.2 Methodology

4.2.1 The appraisal identifies and evaluates 'likely significant effects' of all reasonable alternatives, including the preferred approach, on the baseline, drawing on the sustainability objectives and issues identified as a methodological framework.

4.2.2 A scoring system is used to appraise options against the framework and to give an indication as to whether they are likely to have a positive or negative significant effect:

+ +	Very positive effects – the option would significantly help in achieving the objective
+	Positive effect – the option would help in achieving the objective
/	Neutral effect – the option would neither help nor hinder the achievement of the objective
-	Negative effect – the option would be in conflict with the objective
- -	Very negative effect – the option would be in significant conflict with the objective
?	Uncertain – more information needed
0	No effect likely – there is no relationship between the option and the objective

4.2.3 The methodology for appraising options was initially proposed as part of the Scoping Report to ensure a consistent and transparent approach would be taken to assess how options perform against the framework. This was subsequently revised to take account of comments received and to ensure it was fit for purpose.

4.2.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.

4.2.5 The SEA Directive sets criteria for determining the likely significance of effects. They are a combination of:

- The magnitude of the Plan's effects, including the degree to which the Plan sets a framework for projects, the degree to which it influences other Plans, and environmental problems relevant to the Plan.
- The sensitivity of the receiving environment, including the value and vulnerability of the area, exceeded environmental quality standards, and effects on designated areas or landscapes.
- Effect characteristics, including probability, duration, frequency, reversibility, cumulative effects, transboundary effects, risks to human health or the environment, and the magnitude and spatial extent of the effects.

4.2.6 Given the uncertainties, there is inevitably a need to make assumptions. Assumptions are made cautiously. Ultimately, the significance of an effect is a matter of judgment and justification is included within the text. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on the merits (or otherwise) in more general terms.

4.2.7 Mitigation is considered in a hierarchy: to avoid, reduce, and as fully as possible, offset negative effects. These are included in this report as recommendations to document whether these proposed measures have been incorporated into the Local Plan, and if not, why not.

4.3 Appraisal of Local Plan Strategic Objectives

4.3.1 The strategic objectives for the Worthing Local Plan were published in the Your Town Your Future consultation, May 2016. These are set out in Part 2 of this report. The purpose of the strategic objectives is to provide a link to the vision and three key roles (economic, social and environmental) for the planning system. The objectives provide the direction for the spatial strategy and policies for the plan area.

4.3.2 Stage B1 of the SA process requires the Strategic Objectives of the Local Plan to be tested against the sustainability framework. This helps to identify where objectives are compatible and where conflicts may arise. The following key is used to test compatibility:

√	Positive effect / compatible with sustainability objectives
	No or neutral effect / no direct relationship
X	Negative effect / conflicts with sustainability objectives
?	Uncertain, not possible to predict effects
√/X	Mixed impacts

Table 6: Compatibility of Strategic Objectives against IAA Framework

Local Plan Strategic Objectives	1 Env Quality	2 Biodiversity	3 Land/Soils	4 Energy	5 Water	6 Landscape	7 Built Env	8 Historic Env	9 Health	10 Crime	11 Housing	12 Communities	13 Education	14 Economy	15 Town Centres	16 Travel
1 Housing	X	X	X	X	X	X	√	X	X	√	√	√	X	X	X	√
2 Affordable housing	X	X	X	X	X	X	√	X	X	√	√	√	X	X	X	√
3 Access to Services	√						√		√	√		√	√	√	√	√
4 Infrastructure	√	X	X	√	√	X	√	X	√	√	√	√	√	√	√	√
5 Residential character						√	√	√	√	√	√	√				
6 Reduce inequalities							√	√	√	√	√	√		√	√	√
7 Healthy environment	√						√		√	√		√		√		
8 Employment sites	X	X	X/√	X	X	X	√	X	X	√	X	√	√	√	√	√
9 Town Centre	X		√				√	√		√		√		√	√	√
10 Retail, Culture, Leisure	X		√	X	X		√	√	√	√		√		√	√	√
11 Transport	√					√	√	√	√	√				√	√	√
12 Tourism	X			X	X	√	√	√				√		√	√	√
13 Public Realm	√	X	X	√	√	X	√	√	√	√	√	√	√	√	√	√
14 Skills and jobs							√	√					√	√	√	
15 Green space	√	√	√		√	√			√		X	√		√		
16 Natural env	√	√					√	√	√	√				√	√	√
17 Land use efficiency		√	√	√		√	√		√		√			√	√	
18 Character & heritage		√	√			√	√	√				√				
19 Climate change	√	√	√	√	√	√			√							√
20 Sustainable transport	√								√	√		√		√	√	√

4.3.3 The assessment identified that many of the objectives of the Draft Worthing Local Plan and the IIA framework are compatible, which means they strengthen and support each other. Potential conflicts are described in more detail in the following table:

Table 7: Potential conflicts between IIA Objectives and Plan Objectives

IAA Objective	Plan Objective	Description of potential conflict	Mitigation/Considerations
1) Environmental Quality	1) Housing Delivery 2) Affordable Housing 8) Retain, enhance employment 9) Worthing Town Centre 10) Retail, culture, leisure 12) Tourism	There could be conflict between the strategic objectives that relate to development, including housing, employment, commercial, leisure and tourism-based development and this IIA objective due to the potential for increased traffic and air pollutants, increased demand for water and potential for other forms of pollution.	Policies should seek to reduce the need to travel by car, promote and enable sustainable forms of travel, should specify how resources should be used sustainably and should seek to reduce various forms of pollution.
2) Biodiversity	1) Housing Delivery 2) Affordable Housing 4) Community Infrastructure 8) Retain, enhance employment 13) Strategic infrastructure	There could be conflict between the strategic objectives that relate to housing delivery, infrastructure and employment and this IIA objective due to potential for loss of habitats and/or species. This will be dependent on what is delivered, how it is delivered and the site developed.	Policies should seek to protect and enhance biodiversity and encourage the incorporation of multi-functional biodiverse design features.
3) Land & Soils	1) Housing Delivery 2) Affordable Housing 4) Community Infrastructure 8) Retain, enhance employment 13) Strategic infrastructure	There could be conflict between the strategic objectives that relate to housing delivery, infrastructure and employment sites and this IAA objective due to potential for development of greenfield sites and agricultural land. This will be dependent on the site developed.	Policies should seek to make the best use of brownfield sites through maximising densities where suitable and appropriate.
4) Energy / CC mitigation	1) Housing Delivery 2) Affordable Housing 8) Retain, enhance employment 10) Retail, culture leisure 12) Support tourism	There could be conflict between the strategic objectives that relate to housing delivery, employment, retail and tourism and this IIA objective due to potential for an increase in energy consumption resulting from an increased population, increased businesses and visitor facilities, and new developments.	Policies should seek to minimise greenhouse gas emissions through incorporation of energy efficient design features and support for incorporation of low/zero carbon sources of energy.
5) Water management / CC adaptation	1) Housing Delivery 2) Affordable Housing 8) Retain,	There could be conflict between the strategic objectives that relate to housing delivery, employment, retail and	Policies should specify how development should be resilient to the impacts of climate change and should promote sustainable resource use. Policies should

		tourism and this IIA objective due to the potential for an increase in demand for water, contribution towards urban heat island effect resulting from increased development and the potential for increased flood risks.	take into account the risk of various types of flooding and seek to minimise flood risk.
6) Landscape & Character	1) Housing Delivery 2) Affordable Housing 4) Community Infrastructure 8) Retain, enhance employment 13) Strategic infrastructure	There could be conflict between the strategic objectives for housing delivery, infrastructure and employment and this IIA objective due to potential for impacts on the SDNP and settlement patterns resulting from development. This will be dependent on what is delivered, how it is delivered and the site developed.	Policies should seek to protect landscape character and promote high quality and sensitive design.
7) Built Environment	No potential conflicts have been identified.		
8) Historic Environment	1) Housing Delivery 2) Affordable Housing 4) Infrastructure 8) Retain, enhance employment	There could be conflict between the strategic objectives for housing delivery, infrastructure and employment and this objective due to potential for impacts on heritage assets. This will be dependent on what is delivered, how it is delivered and the site developed.	Policies should seek to enhance and preserve the historic built environment and promote high quality and sensitive design.
9) Healthy Lifestyles	1) Housing Delivery 2) Affordable Housing 8) Retain, enhance employment	Although housing and employment are both wider determinants of health, this IIA objective is more focused on healthy, active lifestyles. There could therefore be conflict between the strategic objectives for housing delivery and employment and this IIA objective due to potential for increased demand on existing facilities, including open space resulting from an increased population. In addition, there is potential for conflict between the need to develop sites for housing or employment uses and the need to protect sites for open space	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.

		uses, which will compete with each other and will need to be delivered within a finite space.	
10) Crime & Safety	No potential conflicts have been identified.		
11) Housing	8) Retain, enhance employment 15) Protect green space, coastline, natural environment	There could be conflict between the strategic objectives for enhancement and provision of employment sites and protection of greenspace and the natural environment and this IIA objective. This is due to the need to develop sites for housing, the need to retain existing and provide new sites for employment uses and the need to protect greenspace, all of which will compete with each other need to be delivered within a finite space.	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.
12) Communities	No potential conflicts have been identified.		
13) Education	1) Housing Delivery 2) Affordable Housing	There could be conflict between the strategic objectives for housing delivery and this IIA objective due to potential for increased pressure on school infrastructure resulting from an increased population. There may also be competition for sites between different uses.	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure including education provision.
14) Economy	1) Housing Delivery 2) Affordable Housing	There could be conflict between the strategic objectives for housing delivery and this IIA objective due to the need to develop sites for housing and the need to provide new sites for employment uses, both of which need to be delivered within a finite space.	Policies and site selection will need to strike the correct balance in terms of meeting competing needs and allowing and enabling economic growth.
15) Town & Local Centres	1) Housing Delivery 2) Affordable Housing	There could be conflict between the strategic objectives for housing delivery and this IIA objective due to potential for increased pressure on existing services resulting from an increased population.	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure.
16) Travel &	No potential		

Access	conflicts have been identified.		

4.3.4 Conflicts between competing concerns and land uses such as new development and the protection of the environment are always likely to arise. Further detailed assessments at the planning application stage should help to ensure that these concerns are adequately balanced.

Key Findings from the HIA

4.3.5 Table 3 identified those objectives that are of relevance to the SEA Directive 'Human Health' topic and subsequently applicable to the HIA component of this IIA. The fundamental IIA objectives in relation to human health are objective 9: Healthy Lifestyles, objective 10: Crime and Public Safety and objective 12: Communities.

4.3.6 With regards to IIAO9, it is evident that the majority of the strategic objectives of the Draft Worthing Local Plan are compatible with this objective. However, the assessment has shown that there are some potential conflicts between this objective and SO1: Housing, SO2: Affordable Housing and SO8: Employment Sites. Whilst housing and employment are both wider determinants of health and thereby providing good quality housing and provision of employment opportunities will help to address existing health inequalities, this has to be considered against the context of the potential loss of open space to meet demand for housing and employment. There is potential for conflict between the need to develop sites for housing or employment uses and the need to protect sites for open space uses, which will compete with each other and will need to be delivered within a finite space.

4.3.7 With regards to IIA010 (Crime and Safety) and IIAO12 (communities) no potential conflicts have been identified with the strategic objectives of the Draft Worthing Local Plan.

4.3.8 Potential conflicts have also been found between a number of strategic objectives and those IIA objectives that are considered to have an indirect relationship on human health. It is considered that further detailed assessments at the planning application stage (i.e. HIA) should help to ensure a proper assessment of potential conflicts, and where appropriate, identify any suitable mitigation measures.

Key Findings from the EqIA

4.3.9 It is considered that SEA Directive topics 'population' and 'human health' (which overlaps with the HIA component) are of most relevance to the EqIA component of this IIA.

4.3.10 The fundamental IIA objectives pertaining to population are IIAO9: Healthy Lifestyles, IIAO10: Crime and Public Safety, IIAO11: Housing, IIAO12: Communities, IIAO13: Education and IIAO14: Economy. IIAO9, IIAO10 and IIAO12 have been considered in paragraphs 4.3.6-4.3.8 above.

4.3.11 With regards to IIAO11 (housing), it is evident that the majority of the strategic objectives of the Draft Worthing Local Plan are compatible with this objective. However, the assessment has shown that there are some potential conflicts between this and SO8: Employment Sites and SO15: Green Space, Coastline & Natural Environment. This is due to the need to develop sites for housing, the need to retain existing and provide new sites for employment uses and the need to protect greenspace, all of which will compete with each other need to be delivered within a finite space. However, it is considered that Local Plan policies and site selection will need to strike the correct balance in terms of meeting competing needs.

4.3.12 Potential conflicts have been identified between IIAO13 (education) and SO1: Housing Delivery and SO2: Affordable Housing as it is considered that there is potential for increased pressure on school infrastructure resulting from an increased population. Therefore Local Plan policies should seek to ensure adequate and timely provision of necessary supporting infrastructure including education provision.

4.3.13 With regards to IIAO14 (Economy), it is considered that there is potential for conflict with SO1: Housing Delivery and SO2: Affordable Housing due to the need to develop sites for housing and the need to provide new sites for employment uses, both of which need to be delivered within a finite space. Therefore Local Plan Policies and site selection will need to strike the correct balance in terms of meeting competing needs and allowing and enabling economic growth.

4.3.14 Potential conflicts have also been found with a number of strategic objectives and those IIA objectives that are considered to have an indirect relationship on population. It is considered that further detailed assessments at the planning application stage (i.e. HIA / EqIA) should help to ensure a proper assessment of potential conflicts, and where appropriate, identify any suitable mitigation measures.

4.4 Appraisal of Sites

4.4.1 All the available sites identified through the SHLAA, "calls for sites" and the 'Your Town Your Future' consultation have been tested through the site criteria developed as part of the SA framework (Appendix C). The appraisal of potential sites has been undertaken to inform the site selection process in the Local Plan.

4.4.2 An overall rating for each site was reached based on the following classification:

Red, significant constraints. It is unlikely that a site could be developed without a significant negative effect;
Yellow, mixed or some negative constraints. The site could potentially be developed but mitigation is likely to be required;
Green, minimal constraints or there are benefits associated with developing the site.

Table 8: Overview of Sites Appraisal

SA Objective	Indicator	Stagecoach Site, Marine Parade	Grafton Site	Union Place South	Teville Gate	British Gas Site, Lyndhurst Road	Martlets Way	Decoy Farm
Environmental Quality	Worthing Air Quality Management Area (AQMA)	Y	Y	Y	Y	Y	Y	R
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	G	G	G	G	G	G	Y
	Noise	G	G	Y	Y	G	Y	Y
Biodiversity	Sites, Habitats and Species	G	G	G	G	G	G	Y
Land and Soils	Potentially Contaminated Land	Y	G	Y	Y	R	R	R
	Agricultural Land	G	G	G	G	G	G	G
Water	Flooding from	R	R	G	G	G	G	Y

Management	Rivers and Sea	R	R	G	G	G		Y
	Surface Water (awaiting maps)	G	G	G	R	G	G	R
	Groundwater	G	G	G	R	Y	G	R
Landscape and Character	Setting of SDNP	G	G	G	G	G	G	G
	Coalescence	G	G	G	G	G	G	Y
	Undeveloped coastline and countryside	G	G	G	G	G	G	Y
Built Environment	Derelict sites	Y	Y	G	G	G	G	R
Historic Environment	Designated Heritage Assets	R	Y	Y	Y	G	G	G
	Archaeology	R	G	Y	G	R	G	Y
Healthy Lifestyles	Accessible open space, sport and leisure	G	R	G	G	G	G	G
Crime and Public Safety	Indices of Multiple Deprivation	Y	Y	Y	R	Y	G	Y
Communities	Proximity to doctor's Surgeries	G	G	G	G	G	G	Y
	Proximity to Libraries	G	G	G	G	G	G	G
Education	Proximity to	G	G	G	G	G	G	G

SA Objective	Indicator							
	primary schools (infant, junior)	G	G	G	G	G	G	G
	Proximity to secondary schools	G	Y	G	G	G	G	G
Economy	Key office location or industrial estate	R	G	Y	R	G	G	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	G	G	G	G	G	G	Y
Travel and Access	Proximity to train station	Y	Y	G	G	G	G	G
	Proximity to cycle routes	G	G	G	G	G	G	Y
Conclusion		Y	Y	G	Y	G	G	Y

SA Objective	Indicator	HMRC offices, Barrington Road	Centenary House	Civic Site (Stoke Abbott Rd)	Land North of Beeches Avenue	Worthing United Football Club, Beeches Avenue	Land South of Upper Brighton Road
Environmental Quality	Worthing Air Quality Management Area (AQMA)	Y	Y	Y	R	R	R
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	G	G	G	R	R	R
	Noise	Y	Y	Y	G	G	Y
Biodiversity	Sites, Habitats and Species	G	G	G	Y	Y	Y
Land and	Potentially	Y	G	G	G	G	G

Category	Subcategory						
Soils	Contaminated Land	Y	G	G	G	G	G
	Agricultural Land	G	G	G	R	R	R
Water Management	Flooding from Rivers and Sea	G	G	G	G	G	G
	Surface Water (awaiting maps)	R	G	G	G	R	Y
	Groundwater	Y	G	G	G	G	R
Landscape and Character	Setting of SDNP	G	G	G	Y	Y	Y
	Coalescence	G	G	G	G	G	Y
	Undeveloped coastline and countryside	G	G	G	Y	Y	R
Built Environment	Derelict sites	Y	Y	Y	R	R	R
Historic Environment	Designated Heritage Assets	G	Y	Y	G	G	Y
	Archaeology	G	R	R	Y	Y	Y
Healthy Lifestyles	Accessible open space, sport and leisure	G	G	G	G	R	G
Crime and Public Safety	Indices of Multiple Deprivation	G	Y	Y	G	G	G
Communities	Proximity to	G	R	R	Y	Y	Y

SA Objective	Indicator						
	doctor's Surgeries	G	R	R	Y	Y	Y
	Proximity to Libraries	G	G	G	Y	Y	G
Education	Proximity to primary schools (infant, junior)	G	G	G	G	G	G
	Proximity to secondary schools	G	G	G	G	G	G
Economy	Key office location or industrial estate	R	G	G	Y	G	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	G	G	G	Y	Y	Y
Travel and Access	Proximity to train station	G	G	G	Y	Y	Y
	Proximity to cycle routes	G	G	G	Y	Y	Y
Conclusion		Y	Y	Y	Y	R	Y

SA Objective	Indicator	Goring Ferring Gap	Chatsmore Farm	Caravan Club, Titnore Way	Land West of Fulbeck Avenue	Land East of Titnore Road	Land at Dale Road
Environmental Quality	Worthing Air Quality Management Area (AQMA)	Y	Y	Y	Y	Y	Y
	Water Quality (WFD waterbodies and Groundwater Source Protection Zones)	G	Y	G	G	G	Y
	Noise	G	Y	G	G	G	Y

		G	Y	G	G	G	Y
Biodiversity	Sites, Habitats and Species	Y	Y	Y	Y	Y	Y
Land and Soils	Potentially Contaminated Land	G	G	G	G	G	R
	Agricultural Land	R	R	R	R	R	G
Water Management	Flooding from Rivers and Sea	Y	Y	G	G	G	Y
	Surface Water (awaiting maps)	R	R	Y	R	G	Y
	Groundwater	Y	R	Y	Y	Y	Y
Landscape and Character	Setting of SDNP	R	R	G	Y	R	Y
	Coalescence	R	R	G	G	G	R
	Undeveloped coastline and countryside	R	R	Y	Y	Y	R
Built Environment	Derelict sites	R	R	R	R	R	R
Historic Environment	Designated Heritage Assets	Y	Y	Y	G	Y	G
	Archaeology	G	R	G	G	G	G
Healthy	Accessible open	R	G	G	R	G	G

Lifestyles	space, sport and leisure	R	G	G	R	G	G
Crime and Public Safety	Indices of Multiple Deprivation	G	G	Y	Y	Y	G
Communities	Proximity to doctor's Surgeries	Y	Y	Y	Y	Y	Y
	Proximity to Libraries	Y	Y	Y	Y	Y	Y
Education	Proximity to primary schools (infant, junior)	Y	Y	G	G	G	G
	Proximity to secondary schools	G	G	Y	Y	Y	G
Economy	Key office location or industrial estate	G	G	G	G	G	G
Town Centres	Within 800m of a town centre defined by the NPPF as including town centres, district centres and local centres	Y	Y	G	G	G	G
Travel and Access	Proximity to train station	G	G	Y	Y	Y	G
	Proximity to cycle routes	G	G	G	G	G	G
Conclusion		R	R	Y	Y	Y	R

4.4.3   The full results of this appraisal can be found in Appendix D1.

4.4.4   It should be noted that at this stage no schemes or options are being assessed. All sites have been tested with no assumptions being made on the type or nature of development. This will be considered through the testing of Local Plan policy options for potential site allocations. Therefore constraints are scored negatively even though it is acknowledged that in some cases a

scheme could bring enhancements. However, it is not considered appropriate at this stage to make an assumption whether a scheme would deliver an enhancement or benefit. As evidence studies are produced, this assessment will be revisited. Therefore it is possible that the individual and overall scores of sites may change following the publication of further evidence such as the proposed update to the Strategic Flood Risk Assessment that will support the Local Plan.

4.4.5   Of all the sites tested three have been given an overall rating of green. These are:
• Union Place South;
• British Gas Site Lyndhurst Road;
• Martlets Way;
Although these sites have potentially contaminated land which will require remediation, they are vacant brownfield sites in highly sustainable locations or within the town centre with little or no other constraints.

4.4.6   Four sites have been given an overall rating of red. These are:
• Worthing United Football Club, Beeches Avenue;
• Goring Ferring Gap;
• Chatsmore Farm;
• Land at Dale Road (undeveloped part of Brooklands Park);

4.4.7   The Worthing Landscape and Ecology Study (2017) concluded that development at Goring Ferring Gap, Land at Dale Road and the majority of Chatsmore Farm (excluding the south western corner) would have a significant and detrimental effect on the character of the landscape as a whole and/or on separation between settlements, the setting to existing settlement or the South Downs National Park.

4.4.8   Throughout the appraisal a number of sites were scored 'red' against various criteria. The recommendations of evidence studies will need to be considered and options tested to determine the extent to which it is possible to mitigate these.

4.5 Appraisal of Options

4.5.1 In-line with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present an appraisal of "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" whilst in-line with Schedule 2(8) there is a need to explain "the reasons for selecting the alternatives dealt with.

4.5.2 The guidance states that a range of options should be identified and considered at an early stage in the Local Plan making process. These should be reasonable, realistic, deliverable and sufficiently distinct to enable meaningful comparisons to be drawn. The following options do not meet these requirements and have therefore been scoped out:

Table 9: Options Scoped Out

Do Nothing The sustainability appraisal for the Worthing Core Strategy considered a 'do nothing' option which would result in a reactive land use decision making system as opposed to a planned framework. The existing Development Plan for Worthing is the Worthing Core Strategy which was adopted in 2011. The intention was that this document would help to guide development in the Borough until 2026. However, since its adoption central government has changed the planning system which has had many implications for local authorities, particularly in how housing needs are addressed and cross boundary matters are considered. Without a new Local Plan there is a risk that the Council would lose a degree of local control of planning matters as the likelihood of speculative development proposals would increase. It is a statutory requirement to have a Local Plan in place so on this basis it is considered that 'Do Nothing' is not a realistic option.
Building out to sea Development in Worthing is constrained by a lack of land due to the sea to the south and the South Downs National Park to the north. One option to meet local development needs would be to reclaim land from the sea. The option of building out to sea was considered through a study conducted by Royal Haskoning in 2007 which concluded that the only scenario that would provide sufficient financial return to make the project viable would require intensive development that would have little or no relation to the existing urban character or form. It was estimated that such a scheme would have a major impact on local infrastructure. There has since been no further evidence or proposals to suggest that this would now be viable.

4.5.3 For those alternatives that are realistic and deliverable there is a need to compare all reasonable alternatives including the preferred approach to clearly identify the significant positive and negative effects of each alternative.

4.5.4 Table 10 below identifies where reasonable alternatives have been identified. The conclusions on the overall sustainability of the different alternatives are given, and the reasons for selecting the preferred approach in light of the alternatives. The full appraisal can be found in Appendix D2. Appendix D2 also includes the findings from the HIA and the EqIA.

Table 10: Draft Local Plan Policies

Policy	Summary	Options	Appraisal Findings	Preferred Approach
SP1: Presumption in favour of sustainable development	To integrate the 'presumption' into the Worthing Local plan to ensure the Local Plan contributes to sustainable development.	None identified		
SP2: Spatial strategy	To maximise appropriate development.	Option 1: Brownfield only Option 2: Brownfield land and sustainable urban extensions	Option 1 scores as having positive effects across a number of environmental objectives. However, this needs to be balanced against negative scores for housing, economy, town and local centres and water management reflecting how this option will reduce the number of potential sites for development. There are also a number of neutral effects concerning communities and education. Option 2 scores positively across the majority of social and economic objectives. A number of negative environmental effects have been identified associated with development of greenfield sites.	Overall option 2 scores more positively due to the larger number of potential sites and the opportunities this brings to meet the widest range of needs by enabling a greater mix of uses to be accommodated across a variety of sites. It is recommended that environmental evidence is considered when selecting appropriate sites for development.

SP3: Development sites	Sets a housing figure and a minimum amount of employment floorspace to be provided	*Given the highly constrained nature of the borough, no options have been identified for setting the employment floorspace target.*	The high densities required in Option 1 would result in very negative effects in terms of biodiversity and landscape and character. This option also scores negatively in terms of environmental quality, water management, historic environment, healthy lifestyles, communities and economy as it is assumed that other uses on sites would be restricted. The appraisal highlights that although this option delivers the highest level of housing, the densities required may impact on the type and mix of housing provided. However, there is a positive effect for crime and safety.	Option 3. This option is likely to result in less significant negative impacts and represents the most balanced approach to meeting competing demands.
		Option 1: Need led approach: This option aims to meet local housing need by assuming all available sites will be allocated for residential development at high densities.		The appraisal identifies potential negative effects for biodiversity, water management and housing. It recommends that mitigation and opportunities for green infrastructure identified in the landscape study should be implemented as part of developments. In addition other policies in the Plan should seek to ensure suitable minimum densities to make the most efficient use of land whilst delivering a mix of uses, deliver a net gain in biodiversity, create protect and enhance green infrastructure networks, ensure the use of Sustainable Drainage Systems, require water efficiency measures and deliver adequate public open space.
		Option 2 Supply led approach: This option assumes all available sites will be allocated for development at an appropriate density to deliver housing and where suitable a mix of uses.	Option 2 scores positively for housing, built environment, crime, economy and town centres due to the levels of development this option would enable. However these benefits are largely outweighed by the very negative effects from the loss of biodiversity and the potential impact on the setting of the South Downs National Park and existing settlement patterns as a result of coalescence. There is a neutral impact on healthy lifestyles.	
		Option 3: Evidence led approach: This option has taken into account findings of evidence studies. As such the developable area of some sites has been reduced to allow sufficient mitigation and buffers. In addition a number of sites included in Option 2 have been excluded.	Option 3 scores negatively for housing due to the significant shortfall that would result from this option. However Option 3 would not result in any very negative effects and has improved scores for biodiversity, land and soils and landscape and character compared with the other options. There is a neutral impact on healthy lifestyles.	

SP4: Countryside and undeveloped coast	Designates land outside of the Built Up Area Boundary as countryside and undeveloped coast to protect landscape and coastal character including its environmental and recreational value	None identified. The overall impact of this policy is assessed as part of the total effects. The option of protecting or allocating individual sites for development is assessed below.		

SP5: Local Gaps	Designates land as Local Gap to preserve Worthing's character and prevent coalescence. *The overall impact of this policy is assessed as part of the total effects. The option to allocate or protect individual sites is tested in this table below.*	The suitability of specific sites and the extent to which they form Local Gap has been informed by the landscape evidence. This recommends that the following sites are designated as Local Gap: Option 1: Chatsmore Farm Option 2: Goring Ferring Gap	Option 1 has very positive effects on landscape & character and built environment objectives through its primary purpose of maintaining separation between settlements and preventing coalescence. There are also other positive effects including on healthy lifestyles and economy through the indirect impacts of preserving the land in its current undeveloped state. It should be noted that there are very negative impacts associated with resisting development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated. Option 2 has very positive effects when scored against landscape and character and historic environment reflecting the benefits of maintaining separation between settlements. There are also multiple other positive impacts including on healthy lifestyles and communities. It should be noted that there are very negative impacts associated with resisting	All these options have an overall positive or neutral impact however it is recognised that Chatsmore Farm and Goring Ferring Gap score stronger due to the additional positive effects identified relating to the historic environment.

			development on this site in terms of housing delivery and to a lesser extent economic growth which cannot be mitigated. In relation to HIA/EqIA this option has very positive effects when scored against healthy lifestyles and communities reflecting the benefits of maintaining separation between settlements.	
		Option 3: Brooklands Recreation Area and abutting allotments	Option 3 has very positive effects associated with landscape & character and the built environment objectives due the primary purpose of the Local Gap maintaining separation between settlements. There are also positive effects for communities and healthy lifestyles reflecting the benefits of maintaining separation between settlements. Negative effects are identified against the housing and economy objectives due to the potential loss of land for development however given that most of this site is currently in use as a park, the area that would be available is limited to the north western corner. Other objectives are rated as neutral recognising the indirect benefits in terms of protecting this area of existing open space.	
		Option 4: Land east of proposed development (site A3) at Upper Brighton Road	The scoring of Option 4 reflects the compact nature of this site and that it will ultimately form part of the wider gap alongside designations to the east in Adur. This option has multiple positive benefits including for communities reflecting its contribution to protecting the Gap as a whole and preventing	

| | | | coalescence. It scores negative due to the lack of housing that potentially could have been delivered here in addition to the allocation on the remainder of the site. There is a neutral impact for healthy lifestyles as designating this part of the site as Local Gap will have no direct impact given the small size of the site. | |

| SP6: Local Green Space Designation | Designates land as Local Green Space to protect green areas of particular importance to the local communities they serve.

The overall impact of this policy is assessed as part of the total effects. The option of protecting or allocating individual sites for development is assessed below. | The sites designated were identified through community engagement and interest. The decision as to whether they are suitable and meet the criteria for Local Green Space designation has been informed by evidence.

Option 1: Goring Ferring Gap

Option 2: Chatsmore Farm | Option 1 has very positive effects in terms of biodiversity, historic environment, landscape & character, healthy lifestyles and communities reflecting the reasons the site is valued. This is balanced against a very negative effect for housing and a negative effect for economy objectives reflecting the level of protection given by the designation which will restrict most development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.

Option 2 scores less positively than the other two but still has very positive effects against landscape & character and communities objectives and a positive effect against healthy lifestyles reflecting the aspects the community values. This is balanced against a very negative effect for housing and a negative effect for economy objectives reflecting the level of protection given by the designation which will restrict most development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state. | All these sites score positively overall and should be designated as Local Green Space in the Local Plan. |

		Option 3: Brooklands Recreation Area	Option 3 has very positive effects in terms of biodiversity, healthy lifestyles and communities it also has a positive effect against the landscape & character objective reflecting the reasons the site is valued by the local community. This is balanced against negative effects for housing and economy objectives reflecting the level of protection given by the designation which will restrict most development but acknowledging that as most of the site is in use as formal recreation it is unlikely to become available for development. In addition there are a number of neutral effects identified through indirect impacts of preserving the site in its current state.	
PA1: Goring Ferring Gap	Protects this site from inappropriate development using SP4: Countryside and Undeveloped Coast, SP5: Local Gaps and SP6: Local Green Space Designation.	Option 1: Protecting the site	Option 1 scores as having very positive effects against the landscape & character objective which has to be balanced against very negative effects associated with the housing objective. In addition to this the option generally scores positively against a number of environmental objectives and for communities as protecting the site would safeguard an asset that is well valued by the local community. This option scores as having neutral scores on healthy lifestyles and economy objectives reflecting how with this option some aspects of the site will remain unchanged.	The option to protect the site from inappropriate development is considered to be the most sustainable scoring positively overall. This is despite a very negative effect associated with the loss of housing delivery, which it is not considered possible to mitigate
		Option 2: Allocating the site for development.	Option 2 scores as having very positive effects for housing which has to be balanced against very negative effects on the landscape & character objective. This	

			option also scores negatively against a number of other environmental and social objectives including healthy lifestyles and communities. There are also several uncertain scores relating to possible additional or indirect benefits of development.	
PA2: Chatsmore Farm	Protects this site from inappropriate development using SP4: Countryside and Undeveloped Coast, SP5: Local Gaps and SP6: Local Green Space Designation.	Option 1: Protecting the site.	Option 1 has very positive effects against the landscape & character objective reflecting the sensitive nature of this site. There are also a range of other positive effects in terms of communities, water management and soils objectives. There are a number of neutral effects including on healthy lifestyles and the economy recognising that by protecting the site it will essentially remain unchanged from the baseline situation. The positive effects are balanced against a very negative effect in terms of restricting housing delivery in an area unable to meet its local housing need. It is not considered that this can be mitigated.	The option to protect the site from inappropriate development is considered to be the most sustainable scoring positively overall. This is despite a very negative effect associated with the loss of housing delivery, which it is not considered possible to mitigate.
		Option 2: Allocating the whole site for development. *The landscape study identifies the option of developing in the south west corner which it identifies as being less sensitive. However this option has been screened out as*	Option 2 has very negative effects against the landscape & character objective which cannot be mitigated due to the permanent loss of gap between settlements and on the impact of the setting of the South Downs National Park. There are also a number of other negative effects against environmental objectives and on healthy lifestyles and communities. However this option does score as having very positive effects positively due to its ability to contribute to meeting local housing need and	

		there is currently no realistic means of access to this part of the site.	recognising the benefits of delivering housing in a highly sustainable location.	

PA3: Brooklands Recreation Area	Protects this site from inappropriate development using SP4: Countryside and Undeveloped Coast, SP5: Local Gaps and SP6: Local Green Space Designation.	Option 1: Retaining the north west portion of the site (known as Dale Road) and protecting the site. Option 2: Allocating the north west portion of the site (known as Dale Road) for development. *Given the current use of Brooklands Park (excluding the Dale Road area) as a park and the recent investment, improvements and community engagement in future enhancements, the allocation of this site for development is not considered a reasonable option.*	Option 1 scores very positively for communities and landscape & character objectives. There are also positive benefits when scored against healthy lifestyles and water management objectives. A negative effect has been identified associated with the potential loss of opportunities to remediate the former landfill in the north west corner of the site. In addition there are a number of neutral effects reflecting the recognition that the site is already protected through the planning system and therefore continuing to protect it will often result in no significant changes Option 2 to allocate the part of the site known as Dale Road scored positively for economy, housing and land & soils objectives reflecting the potential benefits of development and the opportunity this may bring in terms of remediating contaminated land caused by the former landfill. However a very negative effect was scored against landscape & character reflecting the sensitive location of the site. This option also scored as having negative effects against biodiversity and water management objectives reflecting the potential impact of development. In relation to the HIA/EqIA neutral effects were scored for healthy lifestyles and communities as the option would remove the opportunity to expand the park into this space.	The option to protect the site is the most sustainable option overall. The option to protect the site excluding the north western corner (known as Dale Road) was not tested however the appraisal of allocating that part of the site shows it has very negative effects associated with the sensitivity of the site in terms of landscape and character. Opportunities should be promoted to expand the Park and recreation area into the north west portion of the site currently inaccessible to maximise benefits to the local community.

68

A1: Caravan Club	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A2: Land West of Fulbeck Avenue	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A3: Upper Brighton Road	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site. The portion of land adjacent to the east of this site is designated under Policy SP5 as Local Gap. It is not considered that it is reasonable to consider including this within the allocation area as it form the easement strip for cables for the Rampion wind farm and is therefore unsuitable for development.		
A4: Decoy Farm	The site is considered to be 'deliverable'. This means that it is viable, available and	None identified. The evidence suggests that the site is deliverable and suitable for development consisting of industrial uses.		

	offers a suitable location for development.	Given the local need for employment floorspace it is not considered a reasonable alternative to not allocate the site.		
A5: Teville Gate	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A6: Union Place South	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A7: Grafton	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
A8: Civic Centre Car Park	The site is considered to be 'deliverable'. This means that it is viable, available and offers a suitable location for development.	None identified. The evidence suggests that the site is deliverable and suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC1: Centenary House	The site is considered to be	None identified. The evidence suggests that the site		

70

	suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	is suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC2: British Gas Site, Lyndhurst Road	The site is considered to be suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	None identified. The evidence suggests that the site is suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC3: Stagecoach, Marine Parade	The site is considered to be suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	None identified. The evidence suggests that the site is suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC4: Worthing Leisure Centre	The site is considered to be suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	None identified. The evidence suggests that the site is suitable for development. Given the local housing need it is not considered a reasonable alternative to not allocate the site.		
AOC5: HMRC Offices, Barrington Rd	The site is considered to be suitable for development but	None identified. The evidence suggests that the site is suitable for development. Given the local housing need it is not		

	there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	considered a reasonable alternative to not allocate the site.		
AOC6: Martlets Way	The site is considered to be suitable for development but there is less certainty about the likely mix of uses, site capacity and delivery timeframes.	None identified. The evidence suggests that the site is suitable for development. Given the local need for employment floorspace and the existing use of the site it is not considered a reasonable alternative to not allocate the site.		
OS1: Land east of Titnore Lane	The site has been omitted from the Plan. The evidence suggests the site is not suitable for development.	None identified. The evidence suggests there are constraints that cannot be overcome and the site is therefore not suitable for development.		
OS2: Land north of Beeches Avenue	The site has been omitted from the Plan. The evidence suggests the site is not suitable for development.	None identified. The evidence suggests there are constraints that cannot be overcome and the site is therefore not suitable for development.		
OS3: Worthing United Football Club	The site has been omitted from the Plan. The evidence suggests the site is not suitable for development.	None identified. The evidence suggests there are constraints that cannot be overcome and the site is therefore not suitable for development.		

CP1: Housing Mix & Quality	To deliver a wide choice of quality homes by planning for a mix of housing.	Option 1: Require developments to meet the optional higher Building Regulations standard M4(2) for Accessible and Adaptable dwellings where feasible and viable and for	Option 1 scores very positively in terms of the benefits to the health and well-being of individuals and communities by enabling people to remain in their homes for longer, and improving the quality and	Option 1: This option scores most positively due to the benefits for the community and health and well-being of the widest range of

		10% of homes on major developments to meet Building Regulations requirement M4(3) wheelchair user dwellings.	choice of housing available to those with mobility issues or requiring housing accessible for wheelchair users. However there are a number of uncertain and neutral scores which recognise the potential that this may conflict with site constraints and the potential impact on viability.	individuals. Although it is recognised that this may increase the cost of building homes, this is outweighed by the social benefits.
		Option 2: Expect Applications to comply with the optional higher standard M4(2) only.	Option 2 scores positively in terms of the benefits to the health and well-being of individuals and communities by enabling people to remain in their homes for longer. This would particularly affect older people although would also support those with mobility issues. However the scoring also recognises the potential impact on viability and consequently housing delivery due to increased build costs	Policy wording should ensure that these requirements only apply where feasible and viable to reduce some of the identified potential negative and uncertain impacts. The impact of this policy on viability should be tested.
		Option 3: Continue to rely on current Building Regulations standards.	Option 3 scores fairly neutral compared with the baseline however in the longer term this may place greater demand for specialist housing as the population ages if existing homes cannot be adapted. It results in a negative effect on healthy lifestyles as this may place greater demand for specialist housing as the population ages if existing homes cannot be adapted	

CP2: Density	Promote an effective use of land. This Policy also sets minimum densities as required by the	Option 1: Require new dwellings to meet the minimum nationally described space standards and local standards for external space.	Option 1 brings the most positive benefits in terms of people's health and well-being, and communities. However it is also recognised that there may be a risk in terms of viability that could impact delivery of smaller sites and affordable housing.	Option 1: Subject to viability testing, this scores more positively due to its impact in terms of reducing health inequalities and helping to support stable communities.

	revised NPPF. Alternative minimum densities would not be sufficiently distinct to draw comparisons and therefore no reasonable alternatives have been identified.	Option 2: Not setting minimum space standards	Option 2 scores negatively as without minimum space standards homes may not always be a sufficient size to support health and well-being. This is likely to specifically impact those on lower incomes exacerbating health inequalities. However this option does score positive in so far as it is recognised that on some sites not having minimum space standards may enable additional dwellings to be delivered.	

CP3: Affordable Housing	Deliver an appropriate type and tenure of affordable housing.	This policy is in accordance with the Written Ministerial Statement and revised NPPF in only seeking affordable housing on sites providing 10 homes or greater. No reasonable alternatives have been identified The proportion and types of affordable housing required were identified through the Housing study. No reasonable alternatives have been identified.		
CP4: Gypsy and Traveller and Travelling Showpeople	Set criteria by which relevant applications will be assessed.	None identified		
CP5: Quality of the Built Environment	Seeks to ensure high quality design.	None identified		
CP6: Public Realm	Deliver enhancements to the public realm	None identified		
CP7: Healthy Communities	Promote healthy communities and seek a reduction in	None identified		

	health inequalities			
CP8: Open Space, Recreation and Leisure	Ensure adequate open space is provided and protect existing	None identified		
CP9: Planning for Sustainable Communities / Community Facilities	Protect and support improvements to community facilities	None identified		
CP10: Delivering Infrastructure	Plan positively for infrastructure.	None identified		
CP11: Economic Growth and Skills	Support a strong and diverse local economy and local employment skills.	None identified		

CP12: Protecting and Enhancing Existing Employment Sites	Encourage provision of new employment premises and sites	Option 1: Protect key industrial estates, business parks and office locations. Option 2: Avoid the long term protection of employment sites allowing a more flexible approach.	Option 1 would support local economic growth bringing very positive effects for the local economy. The safeguarding of local jobs also brings positive effects for local communities and may contribute to a reduction in health inequalities as well as supporting the town and local centres. However it is recognised that protecting employment sites may negatively impact housing delivery. In addition the appraisal has highlighted negative effects should employment uses on a site become redundant resulting in vacant properties. Option 2 scores positively in terms of enabling a more flexible approach to uses which may help ensure a more effective use of land. However it scores very negatively due to the potential loss of employment space to non employment	Option 1: This option scores more positively overall and is therefore the most sustainable. To mitigate the potential negative effects resulting from vacant properties, wording should be included in the policy to allow the release of those sites that are genuinely redundant or vacant for long periods. In addition consideration should be given to the use of Article 4 Directions to ensure this policy is effective.

			uses, reducing employment opportunities within the Plan area. This consequently also scores negatively due to the potential loss of jobs which may increase local unemployment and exacerbate health inequalities.	
CP13: The Visitor Economy	Support and enhance visitor attractions and accommodation.	None identified		
CP14: Retail and Main Town Centre Uses	Support the vitality and viability of town centres.	Option 1: Increase in flexibility: The Retail Study recommended a change in boundary to some shopping areas which would result in a reduction in the area within which only retail uses would be allowed and an increase in the area within which wider uses would be encouraged. It also recommended increased flexibility within District Centres. Option 2: Retain existing approach	Option 1 scores as having positive effects against social and economic objectives with no negative effects identified. Option 2 scores as having neutral effects overall against social and economic objectives	Option 1 allowing greater flexibility scores more positively overall and is therefore the most sustainable.
CP15: A Strategic Approach to the Historic Environment	Protect and enhance the historic environment and heritage assets.	None identified		
CP16: The Historic Environment	Protect and enhance the historic environment and heritage assets.	None identified		
CP17: Sustainable Design	Mitigate and adapt to climate change	Option 1a Require optional higher Building Regulations standard on	Option 1a brings very positive impacts in terms of the environment, climate change	Options 1a and 2a bring more positive effects and are

| | | water efficiency | adaption and communities. However it is acknowledged that there may be cost implications which could impact the delivery of housing particularly on smaller sites. There is no link between this option and healthy lifestyles. | the most sustainable options.

To mitigate potential negative effects, both of these options should be informed by viability testing to understand and potential impact on housing delivery and the policy wording for option 2a should also include an allowance for historic buildings recognising that in some cases the energy efficiency measures needed to reduce carbon emissions may not be appropriate. |
|---|---|---|---|---|
| | | Option 1b Rely on current standards. | Option 1b brings mostly neutral effects including for communities reflecting that there is no change from the baseline situation. There is no link between this option and other HIA/EqIA relevant objectives including healthy lifestyles, crime and public safety, housing, education and economy. | |
| | | Option 2a. Require minimum sustainability standards (including carbon emissions, energy efficiency standards and BREEAM rating) | Option 2a brings very positive effects in terms of energy, healthy lifestyles and communities due to the potential lower energy costs. However there are potential negative effects due to the impact on historic buildings and viability for smaller sites. Mitigation has been identified which should be incorporated within the Local Plan. | |
| | | Option 2b. Rely on current standards. | Option 2b to rely on current standards brings mostly neutral effects including against the communities objective reflecting that it presents no change to the baseline situation. Therefore comparatively it is likely to bring fewer benefits in terms of climate change mitigation but equally less potential to negatively impact on housing delivery due to viability. There is no link between this option and healthy lifestyles, crime and public safety, housing, education and economy. | |

CP18: Energy	Support development of renewable, low carbon or decentralised energy schemes.	None identified		
CP19: Biodiversity	Protect and enhance biodiversity achieving net gains.	None identified		
CP20: Green Infrastructure	Encourage the creation and enhancement of a green infrastructure network and assets	None identified		
CP21: Flood Risk and Sustainable Drainage	Ensure flooding from all sources is safely managed, not increased and reduced overall.	None identified		
CP22: Water Quality and Protection	Protect and enhance water quality.	None identified		
CP23: Pollution and Contamination	Prevent development from contributing to our being put at risk from unacceptable levels of pollution.	None identified		

4.6 Total, Cumulative and Synergistic Effects

4.6.1 Total effects are all of the Local Plan's effects. The sustainability appraisal should identify describe and evaluate the likely significant effects. The likely total effects across the Draft Worthing Local Plan policies on each of the appraisal objectives are shown below in Table 11. The full appraisal of the Draft Local Plan can be found in Appendix D3.

4.6.2 The SEA Directive also requires an assessment of cumulative and synergistic effects. Cumulative effects are important because the plan itself may not have a significant effect, but when added to other actions its effects may be significant and require additional mitigation. Synergistic effects are a subset of cumulative effects, where effects interact to produce a total effect greater than the sum of the individual effects. These often happen as habitats, resources or communities get close to capacity. Synergistic effects are assessed as part of the cumulative effects assessment.

4.6.3 Part 1 of the Draft Local Plan does not contain any policies. Therefore the appraisals below relate only to Parts 2, 3 and 4 of the Draft Plan. Policy SP1: Presumption in Favour of Sustainable Development has not been subject to this appraisal as it is a model policy recommended for inclusion by PINS and therefore any SA findings would do little by way of influencing the policy.

Table 11: Total Effects of the Draft Local Plan

Objective 1. Environmental Quality																																																
Part 2						**Part 3**																	**Part 4**																								

SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
-	-	0	0	0	0	0	-	?	0	0	0	0	0	0	0	0	0	0	0	-	-	0	0	0	/	0	0	/	0	0	+	0	0	0	0	0	0	0	0	+	+	+	++	++	?	0

Conclusions	Parts 2 and 3 of the Plan score negatively across some policies recognising the potential for development, especially those sites in close proximity to the AQMA, to increase traffic negatively impacting on air quality. Part 4 of the Plan scores more positively with some very positive effects reflecting the intention of some of these policies to protect and enhance the natural environment.

HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.	
Cumulative	The expansion of the AQMA suggests that air quality issues were worsening due to a combination of increased levels of traffic congestion and the growth in popularity of diesel vehicles. However following this an Air Quality Action Plan is in place and a local partnership has been established to coordinate actions to improve air quality, on a wider scale vehicle emissions are also expected to reduce. However, the scale of development proposed in the Local Plan may have the potential to negatively impact on these efforts. It is not possible to determine the extent of this in terms of whether the impact will be sufficient to reduce the level of improvement that may have otherwise been achieved, or prevent an improvement altogether. However it should be acknowledged that without the Local Plan development is still likely to come forward through windfall sites but without the mitigation provided through the policies in the Draft Plan. In terms of synergistic effects it is recognised that although air quality impacts on environmental quality, it has a far greater impact on health.	

Objective 2. Biodiversity

Part 2					Part 3																	Part 4																								
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
/	-	+	+	+	-	-	-	-	0	0	0	0	0	0	0	0	0	0	-	-	/	0	0	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	++	+	+	+	+	0	0

Conclusions	Part 3 scores negatively reflecting the potential impact of development however this is addressed through other policies in Parts 2 and 4 of the Plan which score positively and Policy CP19 which scores as having very positive effects.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative	Wider legislation commits to protecting and enhancing biodiversity including through growing a resilient network and providing net gains. The Draft Local Plan will further support this and help identify opportunities for enhancement and delivery of net gains on the proposed development sites.

Objective 3. Land and Soils

Part 2					Part 3																	Part 4																							
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
+	?	+	+	0	-	-	--	+	+	+	+	+	+	+	+	?	+	+	-	--	-	0	/	0	0	0	0	0	0	0	0	+	/	0	0	0	0	0	0	0	0	0	0	+	0	0

Conclusions	Part 2 of the Plan scores positively as policies require the effective use of land and protect the Best and Most Versatile Agricultural Land. Part 3 of the Plan received mixed scores reflecting the approach to allocate both brownfield and greenfield sites. Part 4 of the Plan generally scores positively overall with policies requiring remediation of contaminated land, effective use of land and minimum densities.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative	Only 8% of land is outside of the Built Up Area however this does contain areas of the Best and Most Versatile Agricultural Land. The Local Plan will ensure that some of these key sites are protected despite the pressures for development.

Objective 4. Energy

Part 2					Part 3																	Part 4																							
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
-	-	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	0	0	/	0	0	?	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0

Conclusions	Parts 2 and 3 of the Plan score negatively recognising that new development is likely to increase carbon emissions. This is addressed through policies CP17 and CP18 which both score as having very positive effects.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative	The Climate Change Act includes a commitment to reduce carbon emissions by 80% by 2030. Data between 2005 and 2012 shows a downward trend in CO2 emissions in Worthing. The Draft Local Plan includes policies to improve energy efficiency of buildings and promote renewable, low carbon and decentralised energy schemes. However the level of development proposed through the Draft Local Plan is likely to still result in increased emissions overall both short to medium term through construction and long term during occupation.

Objective 5. Water Management

Part 2					Part 3																	Part 4																									
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
-	-	0	0	+	+	+	0	+	+	+	+	0	0	0	+	+	0	0	?	0	0	?	0	0	+	0	0	/	?	0	+	0	0	0	0	0	0	+	0	0	+	+	+	0	0	0

Conclusions	Part 2 scores negatively overall highlighting that development is likely to increase demand for water resources. Part 3 scores positively including where sites are at a risk of flooding as the policy wording seeks to direct development to areas of lowest flood risk and incorporate SuDS. Part 4 also scores positively overall across a range of policies which seek to address flood risk and demand for water.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative	Worthing is at a significant risk of flooding from surface water. Flooding is likely to increase in intensity and frequency as a result of climate change. Although the total effects of the Plan score positively the Plan overall will likely increase the number of properties at risk, particularly from surface water flooding. In addition even with measures within the Plan to improve water efficiency the demand for water as a result of the Plan is likely to increase overall in an area classified as 'Serious Water Stress' which may exacerbate the effects of climate change.

Objective 6. Landscape and Character

Part 2					Part 3																	Part 4																									
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
+	?	+	+	+	-	-	-	-	0	0	0	0	0	0	0	0	0	0	-	-	-	0	0	0	0	+	0	0	+	0	?	0	0	0	0	+	+	0	+	0	0	0	0	0	0	0

Conclusions	Part 2 of the Plan scores positive with Policy SP5 having very positive effects due to its intention to prevent coalescence. Part 3 scores negatively due to the potential impact of developing undeveloped sites; this is addressed through other policies in Part 4. Part 4 scores positively across a number of housing, communities, heritage, and environment policies.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.

Cumulative	There is a need to maintain and enhance the high quality natural landscape. The Draft Local Plan alongside the emerging South Downs National Park Local Plan will help protect the character and setting of the National Park, undeveloped coast and important views between settlements. Indirectly this may also impact on healthy lifestyles through the protection and provision of open space.		

Objective 7. Built Environment

Part 2					Part 3																	Part 4																								
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
+	0	0	0	0	0	0	0	0	+	++	++	+	0	+	+	0	0	0	0	0	0	0	+	0	0	++	+	+	+	0	+	0	0	0	0	+	+	0	0	0	+	0	0	0	0	0

Conclusions	Where policies are relevant there are a mix of positive and very positive effects across all parts of the Plan these are most strongly associated with the allocation of brownfield sites and design policies. However links are also identified between the achievement of this objective and the historic environment objective.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative	The Draft Local Plan will help secure good design in terms of layout, buildings and public realm. This will complement and could support delivery of identified public realm improvement projects.

Objective 8. Historic Environment

Part 2					Part 3																	Part 4																								
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
0	?	0	+	+	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	?	0	0	?	/	0	+	0	?	0	0	0	0	++	++	0	0	0	0	0	0	0	0	0

Conclusions	Policies in Part 4 of the Plan that relate to the historic environment score as having very positive effects, as do the policies for sites which contain or are located close to heritage assets. Policies also score positively that relate to landscape and character due to protection of historic views between settlements highlighting a link between this and the landscape & character objective.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.

Cumulative	The number of heritage assets at risk has decreased. The Draft Local Plan should preserve and enhance the historic environment.				

Objective 9. Healthy Lifestyles

Part 2					Part 3																		Part 4																									
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
+	+	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?	+	+	+	/	/	0	++	++	+	+	+	0	0	0	0	0	+	0	?	+	+	+	+	+	0

Conclusions	Policies in Part 2 of the Plan all score positively against this objective. Part 3 of the Plan scores as having no direct impact on this objective but this is addressed through policies in Part 4. Part 4 of the Plan scores positively overall across a range of economic, social and environment policies reflecting the wide determinants of health. Policies CP7 and CP8 are the most relevant and score as having very positive effects against this objective.
HIA/EqIA	Policies in Part 2 of the Plan all score positively with regards to healthy lifestyles. It is considered that the Spatial Strategy Policies SP2, 4, 5 & 6 will enable the protection of valued open spaces, green spaces and safeguarding of leisure uses which will help to promote opportunities for exercise and recreation thereby supporting the health of local communities. This will also support EqIA protected characteristics such as 'age', 'disability', 'race'. It is unclear what the overall impact of policy SP3 will be on healthy lifestyles. However this policy does specify where some specific sites will be expected to provide some leisure uses and healthcare facilities and therefore scores positively against the objective. Policies CP7 and CP8 score as having very positive effects and are most relevant to this objective given that they are both health related policies and will help to address the wider determinants of health as well as encouraging healthy lifestyles. The policies will also support EqIA protected characteristics.
Cumulative	Pockets of Worthing suffer with deprivation in relation to health. The Adur and Worthing Council's Public Health Strategy 2018-2021 highlights significant health challenges including higher than average levels of obesity and alcohol misuse; low rates of physical activity; isolated older people and loneliness of all ages; early deaths from cancers; high incidence of mental health issues amongst our young people and low educational attainment. It sets out 5 priorities for enabling the better health and well-being of its communities. The Draft Local Plan will also support this effort to reduce inequalities.

Objective 10. Crime and Public Safety

Part 2					Part 3																Part 4																									
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
0	+	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	/	?	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Conclusions	There is only one policy in each Parts 2 and 3 of the Plan that relate to this objective. Both score positively through the promotion of mixed use developments and the inclusion of high quality public realm. Within Part 4, design policies score positively as does Policy CP11 recognising the link between unemployment and crime.
HIA/EqIA	There is only one policy in each Parts 2 and 3 of the Plan that relate to this objective. Both score positively through the promotion of mixed use developments and the inclusion of high quality public realm which will support health and wellbeing and inclusive environments therefore supporting EqIA protected characteristics such as 'age', 'disability' and 'race'. Within Part 4, design policies score positively as does Policy CP11 recognising the link between unemployment and crime.
Cumulative	Worthing generally has a low crime rate however anti-social behaviour is a key issue particularly in wards with higher levels of deprivation. However statistics show that crime in Worthing is decreasing. The Draft Local Plan should ensure that new developments are designed in ways that support this.

Objective 11. Housing

Part 2					Part 3																Part 4																									
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
					+	+	+		+	+	+	+	+	+	+		+					+	+	+																							
+	+	-	--	--	+	+	+	0	+	+	+	+	+	+	+	?	+	0	?	?	?	+	+	+	+	/	0	+	-	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Conclusions	Although positive overall this objective receives mixed scores. Part 2 of the Plan scores negatively overall with very negative effects identified with Policies SP5 and SP6 highlighting the competing demands for land within an area that is constrained. However this is offset by Part 3 which scores very positive overall due to the contribution the sites will make to the delivery of new homes. Part 4 also scores positively overall with very positive effects associated with the housing policies although a conflict is identified with CP8 again reflecting the competing demands of land to deliver both housing and open space.

EqIA	Policy CP7: Healthy Communities score positively against this objective in the recognition of the need to provide high quality homes within an attractive environment. It is considered that the provision of high quality homes will help to address local housing need and thereby support EqIA protected characteristics 'age', 'disability' and 'race'.	
Cumulative	Within the wider area a number of Authorities are unable to meet their local housing need figure. The shortfall left by the Worthing Local Plan will further exacerbate this potentially impacting on affordability issues and the ability of local residents to find suitable accommodation.	

Objective 12. Communities

Part 2					Part 3																	Part 4																								
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
+	?	0	+	+	0	0	0	0	0	0	0	+	+	0	0	+	0	0	0	0	?	+	0	0	/	0	0	+	+	+	+	+	0	0	+	0	0	+	0	0	+	0	0	0	0	0	+

Conclusions	There are very positive effects identified against this objective with Policies SP6, A8 and AOC4 due to the new or enhanced community facilities and services they will provide.
HIA/EqIA	Policies CP1, CP7 – CP11 score positively against this objective. It is considered that these policies will provide social benefits for communities through the provision of new housing, ensuring healthy communities, safeguarding open space and recreation, safeguarding community facilities and the provision of new social infrastructure. These policies will support the EqIA protected characteristics.
Cumulative	Data suggests that people living at higher densities in Worthing compared to surrounding areas and resident numbers are growing. There are also a high proportion of people over the age of 60 and within the borough there are wards with significant deprivation resulting in inequalities. The Draft Local Plan may place additional pressure on local services and facilities; however it may also provide opportunities in some areas to provide new local facilities.

Objective 13. Education

Part 2					Part 3																	Part 4																								
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
/	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	0	?	0	0	0	0	0	0	0	0	0

Conclusions	Policies SP2 and SP3 in Part 2 of the Plan highlight potential neutral and uncertain effects associated with the impact of development on

	existing facilities. This is addressed through Part 4 of the Plan where policies CP9, CP10 and CP11 will protect and support the provision of new education and training facilities.
EqIA	Policies SP2 and SP3 in Part 2 of the Plan highlight potential neutral and uncertain effects associated with the impact of development on existing facilities. This is addressed through Part 4 of the Plan where policies CP9, CP10 and CP11 will protect and support the provision of new education and training facilities and thereby support EqIA protected characteristics 'age', 'disability' and 'race'.
Cumulative	There is relatively low educational attainment and skills in Worthing particularly in the more deprived areas. The 2011 census results show that Worthing had the third highest unemployment rate in West Sussex however these numbers appear to be reducing. The Draft Local Plan will protect existing and support the provision of new education and training facilities

Objective 14. Economy

Part 2					Part 3																Part 4																									
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
/	+	-	-	-	/	0	0	++	++	++	++	+	+	?	+	?	/	++	0	-	0	0	0	0	0	0	0	0	+	0	+	++	+	+	+	+	+	0	0	0	0	0	0	0	0	+

Conclusions	Part 2 of the Plan has mixed scores with policy SP3 scoring positively due to the commitment for additional employment floorspace, conflicting with policies SP4 to SP6 which seek to protect important areas of open space restricting the land available for new economic growth. Part 3 of the Plan scores positively with very positive effects identified for those sites allocated for mixed use schemes including new commercial floorspace. The relevant policies in Part 4 of the Plan also score positively with policy CP11 scoring as having very positive effects.
EqIA	Policy CP7: Healthy Communities score positively against this objective. The policy seeks to improve the provision of and / access to employment in recognition of the clear links between income and health. This will support the EqIA protected characteristics 'age', 'disability' and 'race'.
Cumulative	Wider strategies including the Adur & Worthing Growth Deal, Coastal West Sussex Economic Plan (2016-2020) and the Adur & Worthing Economic Strategy (2018-2023) set out to achieve growth, boost economic performance and help improve productivity and wages which are currently lower than elsewhere in the South East. The Local Plan will help ensure that whilst land is constrained where appropriate development will also deliver new commercial floorspace for new or expanding businesses. However despite the Local Plan there may still be a loss of offices as a result of Permitted Development Rights.

Objective 15. Town and Local Centres

Part 2					Part 3																Part 4																								
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
+	+	0	0	0	0	0	0	0	+	++	++	0	0	+	++	+	+	0	0	0	0	0	0	0	0	0	+	0	0	0	+	0	0	0	++	+	+	+	+	0	0	0	0	0	+	0

Conclusions	The Plan scores positively overall against this objective. The policies that most directly relate to this objective include the sites within the Town Centre and policy CP14 which score as having very positive effects.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative	Wider strategies including the Worthing Town Centre Investment Prospectus and the Worthing Seafront Investment Plan (2017) set out to promote regeneration and secure investment to deliver projects designed to complement and enhance regeneration of the town centre and improve the public realm. These will help support and improve the vitality and viability of the main Town Centre. The Draft Local Plan also provides certainty to some of the vacant sites in the Town Centre which will support regeneration and allows greater flexibility within the town centre whilst protecting the key retail areas.

Objective 16. Travel and Access

Part 2					Part 3																Part 4																								
SP2	SP3	SP4	SP5	SP6	A1	A2	A3	A4	A5	A6	A7	A8	AOC1	AOC2	AOC3	AOC4	AOC5	AOC6	OS1	OS2	OS3	CP1	CP2	CP3	CP4	CP5	CP6	CP7	CP8	CP9	CP10	CP11	CP12	CP13	CP14	CP15	CP16	CP17	CP18	CP19	CP20	CP21	CP22	CP23	CP24	CP25
?	?	+	0	0	+	0	+	0	+	?	+	0	0	+	0	0	+	+	?	?	?	0	+	0	+	+	+	+	+	+	+	+	0	+	0	0	0	0	0	+	0	0	0	++	0

Conclusions	The Plan scores positively against this objective, however there are also a number of policies in Parts 2 and 3 of the Plan with uncertain effect. It is anticipated that these will be mitigated by Policy CP24 which scores as having very positive effects.
HIA/EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative	Worthing experiences significant congestion on many parts of the highway network, most significantly along the A27. This is likely to continue to worsen without improvements affecting residents, businesses, visitors and commuters and impacting the natural environment and human health. The Government's Roads Investment Strategy 2015 included a project to deliver improvements along the A27 between

	Worthing and Lancing. Initial proposals were consulted on in 2017. If the A27 improvement plan is implemented the Draft Local Plan will complement this by improving access to sustainable modes of transport, however if it is not implemented the transport study that supports the Local Plan has concluded that the scale of development proposed would not significantly worsen congestion.

4.6.4 Overall the Draft Local Plan scores positively against the majority of the appraisal objectives, with no negative scores overall. The Draft Plan scores as uncertain overall against the education objective reflecting that the Plan does not allocate any sites for new education facilities. In addition the Plan scores overall as neutral against the environmental quality and water management objectives. In relation to environmental quality this recognises that despite the measures included in the plan to protect the environment and reduce pollution, the proposed development is likely to generate additional traffic. Equally in relation to water management although the Plan seeks to reduce water use from new developments and mitigate flood risk there is still likely to be an overall demand for water as a result of the Plan and it is likely that additional properties will be built in areas at risk of flooding particularly in relation to surface water.

4.6.5 In relation to cumulative and synergistic effects, potential negative effects are identified in relation to energy, water management and housing due to the likelihood of the Draft Local Plan either exacerbating existing trends, projections or in the case of housing further adding to the shortfall across the local area. Potential neutral effects are identified in relation to Environmental Quality and Travel and Access objectives highlighting the concern that the additional development included in the Draft Local Plan may minimise the positive effect of other measures being implemented to improve air quality. In relation to this issue a synergistic effect was also identified in terms of the impact of air quality on health. In relation to the Communities objective the cumulative effects are rated as uncertain. This is primarily due to the current trend of growing resident numbers and an increase in the proportion of people over the age of 60 which may place additional pressures on local services and facilities. At this stage it is unclear what the impact of the Local Plan will be in terms of both exacerbating this and providing new facilities to alleviate pressures.

4.7 Recommendations

4.7.1 Mitigation of significant negative effects and enhancement of positive effects are a key purpose of SA/SEA. The following section details the mitigation measures recommended by this appraisal. At later stages this will also document whether the proposed measures have been incorporated into the plan and, if not, why.

4.7.2 Where required, in identifying mitigation, the mitigation hierarchy has been followed which sets that avoidance is better than reduction, which in turn is better than offsetting.

Table 12: Mitigation

Policy / Topic	Recommendation
Review of Objectives	Policies should seek to reduce the need to travel by car, promote and enable sustainable forms of travel, should specify how resources should be used sustainably and should seek to reduce various forms of pollution.
	Policies should seek to protect and enhance biodiversity and encourage the incorporation of multi-functional biodiverse design features.
	Policies should seek to make the best use of brownfield sites through maximising densities where suitable and appropriate.
	Policies should seek to minimise greenhouse gas emissions through incorporation of energy efficient design features and support for incorporation of low/zero carbon sources of energy.
	Policies should specify how development should be resilient to the impacts of climate change and should promote sustainable resource use. Policies should take into account the risk of various types of flooding and seek to minimise flood risk.
	Policies should seek to protect landscape character and promote high quality and sensitive design.
	Policies should seek to enhance and preserve the historic built environment and promote high quality and sensitive design.
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.
	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure including education provision.
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs and allowing and enabling economic growth.
	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure.
SP2 Spatial Strategy	The policy could be more explicit in specifically promoting new employment uses as part of development.
AOC1 Centenary House	High quality redevelopment and improved public realm within this prominent site could provide a positive outcome when assessed against the Built Environment objective.
AOC4 Worthing Leisure Centre	
AOC5 HMRC Offices, Barrington Road	
CP1 Housing Mix and Quality	Policy wording should ensure that accessibility standards only apply where feasible and viable to reduce some of the identified potential negative and uncertain impacts.
CP2 Density	The impact of imposing minimum space standards on viability should be

	considered.
CP7 Healthy Communities	The positive effects could be maximised by making specific reference to reducing pollution
CP12 Protecting and Enhancing Existing Employment Sites	To avoid the potential negative effects resulting from vacant properties, wording should be included in the policy to allow the release of those sites that are genuinely redundant or vacant for long periods.
CP17 Sustainable Design	This policy should be informed by viability work to understand the potential impact on the delivery of smaller sites. It should also include allowances for historic buildings as some measures to reduce emissions may not be appropriate.

Part 5: What are the next steps?

5.1 Consultation

5.1.1 Consultation on the Draft Worthing Local Plan and this Draft IIA Report will be from 31 October until 5pm on 12 December 2018. Representations will be reviewed and considered. Depending on the issues raised, the Local Plan may then be amended.

5.1.2 Any significant changes to the Local Plan will require further appraisal. A further round of consultation may also be required. If so, an updated IIA report will be prepared to reflect these changes and accompany the Local Plan.

5.1.3 Following this, the Pre-Submission version of the Local Plan will be published for final comment on the 'soundness' of the plan. Again, an updated IIA report will be prepared to accompany the Local Plan during consultation.

5.2 Proposed Monitoring Framework

5.2.1 It is a requirement of the SEA Directive that the significant effects of a plan or programme are monitored.

5.2.2 The monitoring will be undertaken on an annual basis, where possible, and will be incorporated into the wider annual monitoring and presented in the Annual Monitoring Report for Worthing Borough Council. There may be some indicators which cannot be measures annually, and these will be monitored according to the timescales which are appropriate. Where relevant, the reporting will show where a situation has improved, stayed the same, or become worse, compared to the previous year's data.

5.2.3 Draft monitoring arrangements will be developed and included in the next version of this Report that will accompany the Proposed Submission Local Plan. The final monitoring arrangements will be confirmed in the Sustainability Statement that will be produced after the Local Plan is adopted.

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WORTHING BOROUGH
C O U N C I L