

Proposed Modifications - October 2021

The impact of these proposed modifications has not previously been assessed as part of the Sustainability Appraisal and therefore consideration has been given to the guidance contained in Paragraph 023 of the Planning Practice Guidance on Strategic Environmental Assessment and Sustainability Appraisal. It is not considered that the proposed modifications are significant as they do not in isolation or cumulatively substantially alter the plan and / or are likely to give rise to significant effects. Therefore an update to the Sustainability Appraisal is not required at this time.

The first set of modifications was published in **June 2021**.

In **August 2021** the following Modifications were added (for ease of reference these are shaded **blue**): M1 (a) / M3 (a) / M4 (a) / M11 (a) / M11 (b) / M19 (a) / M24 (a) / M28 (a) / M28 (b) / M32 (a) / M32 (b) / M37 (a) / M39 (a) / M42 (a)

In **October 2021** the following Modifications were added (for ease of reference these are shaded **yellow**): M0, M0 (a), M3/0, M3/1, M3 (b), M10 (a), M11 (a)1, M11 (a)2, M16 (a), M17 (a), M18 (a), M20 (a), M24 (b), M26 (a), M26 (b), M26 (c), M28 (c), M30 (a), M32/0, M32/1, M32/2, M32/3, M32/4, M32/5, M32/6, M32/7, M32/8, M33 (a), M35 (a), M39 (b), M39 (c), M40 (a), M42 (a), M42 (b), M47, M48.

PROPOSED MODIFICATIONS			
Mod Ref	Policy	Issue to Address	Note
Chapter - Prelims and Index			
M10		On the Contents Page of the Plan add a new section ' Appendices ' after Glossary and Acronyms. Then list ' Appendix 1 - Housing Trajectory '	To ensure that the WLP is consistent with national policy and in response to MIQ-43

Chapter 1 - Introduction			
M0 (a)	Para 1.27	Add text to paragraph 1.27 as follows: read as a whole. Strategic level policies are set out in Chapters 2 and 3 and these are followed by site allocations (Chapter 4) and Development Management policies (Chapter 5). Taken together, the policies,.....	To ensure that the WLP is effective and consistent with national policy and in response to MIQ-11
Chapter 2 - Vision & Strategic Objectives			
M1	SP1 - Presumption in favour of sustainable development	Replace the existing wording of criterion c) to state: c) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, the Council will grant permission unless: i. the application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.	For consistency with NPPF In response to SDWLP-66 (Pegasus Group on behalf of Persimmon Homes)
M1 (a)	SP1 - Presumption in favour of sustainable development	Add the following to the end of paragraph 2.7: The Plan should promote a sustainable pattern of development that seeks to: meet the development needs of Worthing; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.	In response to revised NPPF (July 2021)
M2	Policy SP2 - Climate Change	<ul style="list-style-type: none"> Para 2.20 - Add bullet point: 'demonstrate that the development will protect and enhance the borough's natural capital and biodiversity assets' 	In response to SDWLP-57 (Sussex Wildlife Trust)
M3	Policy SP2 - Climate Change	<ul style="list-style-type: none"> Insert new policy criterion - k) Development must not compromise land that is required to deliver towards a nature recovery network.' 	In response to SDWLP-57 (Sussex Wildlife Trust)

M3/0	SP3	Add sentence on to the end of paragraph 2.37 as follows: within a Supplementary Planning Document. This will follow best practice guidance on how to undertake a HIA contained within WSCC Healthy & Sustainable Places - A Public Health and Sustainability Framework (2020) and Public Health England Health Impact Assessment in Spatial Planning (2020).	To ensure that the policy is effective and in response to MIQ-24
M3/1	SP3	Amend criterion a) as follows: a) New development Major residential and commercial development must be designed.....'	To ensure that the policy is effective and in response to MIQ-23 and IL01-Q15
Chapter 3 - Spatial Strategy			
M3 (a)	SS1 - Spatial Strategy	Revise criterion a) as follows: a) will seek to deliver high quality development and provide for the needs of.....	In response to revised NPPF (July 2021) - Paragraph 20
M3 (b)	Paragraph 3.21	Add the following text to after the third sentence of paragraph 3.21: but not yet completed). The housing trajectory in Appendix 1 sets out how each of these sources make up the housing supply position over the Plan period and when delivery is expected.' These are also summarised.....	To ensure that the WLP is consistent with national policy and in response to MIQ-43
M4	Policy SS2 - Development sites	To reflect proposed Modification to A5 - amend table for Decoy Farm as follows:'Indicative Capacity' to: 48,000 14,000 sqm - Industrial / Warehousing as a result the figure included in SS2 b) needs to be revised as follows: b) a minimum of 28,000 24,000 sqm of employment floorspace (industrial and warehousing) and 40,000 9,200 sqm of commercial (retail and leisure) floorspace will be provided	To set out the latest position / and in response to SDWLP-55 (WSP on behalf of Worthing Borough Council)
M4 (a)	SS2 - Site Allocations	Amend 'Main other Uses' column as follows: ● A3 - Centenary House: 10,000 sqm Employment office space (part re-provided)	To provide consistency and in response to

		<ul style="list-style-type: none"> • A5 - Decoy Farm: 14,000 sqm industrial / warehousing Employment (Note - the floorspace figure for this site has previously been amended through proposed modification M4). • A7 - Grafton: 2,500 sqm Commercial /Leisure / Retail • A10 - Martlets Way: 10,000 sqm Employment Industrial / Warehousing • A12 - Teville Gate: 4,000 sqm Commercial /Leisure / Retail and 80 bed hotel • A14 - Union Place: 700 sqm Commercial /90 room hotel / cinema extension 	Inspector's Initial Question 17 (Ref-IL01)
M5	Policy SS3 - Town Centre	<p>Amend para 3.35 after first line add:</p> <p>.....range of uses. In addition, there has been a change in the type of retailer that shoppers are choosing. There is now a stronger demand for smaller, local independent businesses and particularly those that offer environmentally friendly and ethical products. The town centre.....</p> <p>Amend first bullet point just below para 3.36 to add the following text:</p> <p>.....mix of uses. Encourage and support new forms of retail, particularly small local independent retailers.</p>	In response to SDWLP-18 (Transition Town Worthing CIC)
M6	Policy SS3 - Town Centre	<p>Add new criterion g)</p> <p>g) As part of the development of the Green Infrastructure Strategy the Council will consider opportunities to integrate biodiversity within the town centre to address climate adaptation and ecological connectivity.</p>	In response to SDWLP-57 (Sussex Wildlife Trust)
M7	Policy SS4 - Countryside and undeveloped coast	<p>Add the following text to the end of f):</p> <p>f)and landowners. Any development within the setting of the National Park should be sensitively located and designed to avoid adverse impacts on the designated landscape.</p>	In response to SDWLP-73 (SDNPA) Conformity with proposed NPPF Revisions

M8	Policy SS5 - Local green gaps	<ul style="list-style-type: none"> The boundary to (c) Brooklands Recreation Area and abutting allotments should be amended to exclude land within Southern Water's ownership. (See separate mapping extract) 	In response to SDWLP-43 (Southern Water)
Chapter 4 - Site Allocations			
M9	Para 4.1	4.1 All sites included in this section have been assessed in detail through the Council's Strategic Housing Land Availability Assessment (SHLAA) and , the Local Plan Sustainability Appraisal, and the SDWLP Flood Risk Sequential and Exception Test . Supported by these documents and other evidence, a conclusion has been reached that they should be allocated for development. The sequential test concluded that the majority of sites are located in Flood Zone 1 and these are the most sequentially preferable. However due to the limited number of sites available, to ensure that every effort has been made to meet Worthing's full local housing need as far as is practicable and reasonable, all suitably available sites are required including those at risk of flooding. Even with these there is still insufficient capacity to meet Worthing's full local housing need. Therefore it is considered that all the above sites pass the sequential test, as required by the NPPF.	In response to SDWLP-59 (Environment Agency)
M10	A1 - Beeches Avenue	Amend criterion f) as follows: f) Provide a Sustainable Urban Drainage System (SuDS) that includes measures to protect has been informed by a hydrogeological risk assessment to ensure and demonstrate the system does not pose an unacceptable risk to groundwater quality for drinking water in line with Position Statement G10 of Groundwater Protection: Principles and Practice (GP3).	In response to SDWLP-59 (Environment Agency)
M10 (a)	A2 - Caravan Club, Titnore Way	Amend paragraph 4.14: The site is owned by Worthing Borough Council and was previously leased to the Caravan Club. As reflected in this allocation, t The Council and the Caravan Club had been are working towards the grant of a new long term lease to the Club for approximately 3 hectares of the northern part of the site. This would have allowed for the remainder of the site (the southern portion – 2.7 ha) to be allocated for residential development whilst at the same time ensuring that the existing use is retained and improved. Circumstances have since changed and the Caravan Club has surrendered their lease and intend to vacate the site by the end of 2022. As a consequence, the Council is now considering options for the northern part of this site including the potential for additional housing and further evidence will be gathered to help inform future decisions. Delete Criterion g): g) help to protect, and where possible, support the continued use of the land to the north as a caravan site;	Update to highlight recent changes and in response to MIQ-96

		Update and correct subsequent referencing of following development requirements.	
M11	A2 - Caravan Club, Titnore Way	<p>Insert an additional bullet point under the site constraints list:</p> <ul style="list-style-type: none"> • The SFRA identifies the eastern section of the site as being at a high risk of groundwater flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). <p>amend criteria b), and replace criteria c) as follows:</p> <p>b) adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding and maintain a suitable buffer to the lake.</p> <p>c) A site specific Flood Risk Assessment should demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>	In response to SDWLP-59 (Environment Agency)
M11 (a)	A3 - Centenary House	<p>Amend 'Indicative Capacity' as follows:</p> <ul style="list-style-type: none"> • 250 residential units & 10,000 sqm employment floorspace (part re-provided) 	For consistency and in response to Inspector's Initial Question 17 (Ref-IL01)
M11 (a)1	A3 - Centenary House	<p>Amend paragraph 4.15:</p> <p>Redevelopment provides an opportunity to make more efficient use of land, and potential to re-provide and enhance facilities for the existing occupiers Sussex Police. West Sussex County Council has recently announced its intention to relocate their services from this site to Durrington Bridge House and elsewhere in the Worthing area. and WSGC (approx. 5,000 sqm) alongside the delivery of a multi-agency hub offering integrated and co-located public services. Redevelopment would also make use of surplus land for additional employment space (approx. 5,000 sqm) and new homes and additional employment space appropriate to the character of this residential area.</p> <p>Amend Development Requirements Criterion a):</p>	To ensure the policy is up to date and effective and in response to MIQ-98.

		a) deliver a mixed-use community-led scheme to include with facilitating residential development;	
M11 (a)2	A3 - Centenary House	Amend the first bullet point under site constraints: <ul style="list-style-type: none"> • Within an area considered to be at a high risk of groundwater flooding and likely to be at a higher risk from surface water flooding in the future. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). Insert the following additional development requirements: <p>e) A site specific Flood Risk Assessment should demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>	To ensure the policy is effective and consistent with national policy and in response to MIQ-99.
M11 (b)	A4 - Civic Centre	Amend 'Indicative Capacity' as follows: <ul style="list-style-type: none"> • 7,000sqm Integrated Health Hub 	For consistency and in response to Inspector's Initial Question 17 (Ref-IL01)
M12	A5 - Decoy Farm	Amend criterion j) as follows: <p>j) ensure layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes (this includes the two effluent pipelines which run along the northern boundary). Phase occupation to....."</p>	In response to SDWLP-42 (Lichfields on behalf of GlaxoSmithKline Plc)
M13	A5 - Decoy Farm	Amend 'Indicative Capacity' to: <p>Minimum of 18,000 14,000 sqm employment land</p> <p>Para 4.20 - third sentence - Remediation of the site is due to commence at the end of 2020 including was completed at the end of March 2021 and this included the removal.....</p>	Updated to provide clarity and set out the latest position / In response to SDWLP-55 (WSP on behalf of Worthing Borough)

		Para 4.21 - third sentence - Current access for the site is from Decon Way Dominion Way , which is accessed via Dominion Way .	Council)
M14	A5 - Decoy Farm	<p>Amend 5th bullet point of 'Site Constraints' as follows:</p> <ul style="list-style-type: none"> Directly adjoins the boundary of the Household Waste Recycling Site which is safeguarded through the West Sussex Local Plan. The West Sussex Waste Local Plan requires the safeguarding of existing waste sites from other non-waste development which may prevent or prejudice their continued operation for such purposes. <p>Amend criterion f) of the Development Requirements as follows:</p> <p>f) minimise impacts on nearby residential properties; protect the continued operation (and possible future reconfiguration / intensification) of the adjacent household waste recycling site;</p>	In response to SDWLP-61 (WSCC)
M15	A5 - Decoy Farm	<p>Modifications are proposed to the fourth site constraint and development requirement d):</p> <ul style="list-style-type: none"> The Teville Stream (partially culverted) and a number of watercourses run along the site boundaries. There The SFRA identifies areas of Flood Zone 3 associated with these and that small parts of the site are at a high risk of surface and groundwater flood risk. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). <p>d) demonstrate how flood risk will be safely managed across the lifetime of the development, taking climate change into account, and not increased elsewhere; A site specific Flood Risk Assessment should demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>	In response to SDWLP-59 (Environment Agency)
M16	A6 - Fulbeck Avenue	<p>Amend the third bullet point under the site constraints list and inserts an additional bullet point:</p> <ul style="list-style-type: none"> Partly within an area with a high chance of flooding from surface water and at medium risk of groundwater flooding. The site would be at risk from a breach scenario at Somerset Lake and failure of the flood storage facility to the north. These have previously caused flooding in the local area. The SFRA shows a small section of the site in the north and centre is located within Flood Zone 3b. A further northern section of 	In response to SDWLP-59 (Environment Agency)

		<p>the site is also located within Flood Zone 3a and parts of the site are at a high risk of surface water flooding and groundwater flooding. The SFRA also found that Somerset Lake posed a risk to the site in event of breach resulting in 38% of the site being affected on a dry day with depths up to 1.4m and on a wet day over half the site affected with depths up to 1.6m. Therefore development in this location would place additional people at risk of flooding.</p> <ul style="list-style-type: none"> This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment. <p>Modification is proposed to amend criteria c) of the development requirements as follows:</p> <p>c) adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding. A site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk;</p>	
M16 (a)	A6 - Fulbeck Avenue	<p>Delete criterion i):</p> <p>i) give consideration to the continued safeguarding of the composting site located to the west, in line with the Waste Local Plan (Policy W2);</p> <p><i>Note that criterion j) will now become criterion i).</i></p>	To clarify error relating to the extent of the 'buffer'. This will ensure the policy is effective and consistent with national policy and in response to MIQ-110.
M17	A7 - Grafton	<p>Amend the first bullet point of the site constraints list:</p> <ul style="list-style-type: none"> The majority of the site is in Flood Zone 3. The site is therefore at a high risk of coastal flooding and the SFRA states that climate change will have a significant impact on this site with Flood Zone 3 covering the whole site in the future. Therefore development in this location would place additional people at risk 	In response to SDWLP-59 (Environment Agency)

		<p>of flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment.</p> <p>Replace criteria c) of the development requirements with the following:</p> <p>c) A site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>	
M17 (a)	A8 - HMRC Offices	<p>Delete part of the last line of development requirement a):</p> <p>a) deliver of mix of residential and employment uses with emphasis on encouraging the retention of Durrington Bridge House (to the east) and the delivery of employment uses on the western section of the site;</p>	To ensure the policy is clear and effective and in response to MIQ-115.
M18	A9 - Lyndhurst Road	<p>In response to the heritage assets that lie in close proximity to this site and to be consistent with other allocations a new Development Requirement is proposed as follows:</p> <p>h) be sensitive to the Conservation Areas that lie in close proximity to this site.</p>	To strengthen the Development Requirements
M18 (a)	A9 - Lyndhurst Road	<p>Revised Expected Delivery dates from 6+ years to 0-5 years</p>	To reflect progress made on the site and to ensure that the allocation is clear and effective.
M19	A11 - Stagecoach	<p>Amend the first bullet point of the site constraints list:</p> <ul style="list-style-type: none"> Part of the site is within Flood Zone 2 and parts lie in Flood Zone 3. Parts of the site lie within Flood Zone 3 the site is therefore at a high risk of coastal flooding and the SFRA states that climate change will have a significant impact on this site with Flood Zone 3 covering the whole site in the future. Therefore development in this location would place additional people at risk of flooding. This site was included in 	In response to SDWLP-59 (Environment Agency)

		<p>the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment.</p> <p>Replace criteria c) of the development requirements with the following: c) A site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>	
M19 (a)	A11 - Stagecoach	<p>Amend 'Indicative Capacity' as follows:</p> <ul style="list-style-type: none"> 60 residential units & 2,000sqm Commercial /Leisure 	For consistency and in response to Inspector's Initial Question 17 (Ref-IL01)
M20	A12 - Teville Gate	<p>Replace the second bullet point under the site constraints list:</p> <ul style="list-style-type: none"> The SFRA shows 1/3 of the site is at a high risk of surface water flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). <p>Replace criteria c) as follows:</p> <p>c) A site specific Flood Risk Assessment should demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk and protect water quality;</p> <p>The following modification is proposed as an additional development requirement:</p> <p>g) Any development around the station area should take into account the culverted watercourse that runs through the site and has historically resulted in flooding. The course and capacity of this should be taken into account. Opportunities where appropriate to de-culvert and create a biodiversity net gain should be sought.</p>	In response to SDWLP-59 (Environment Agency)

M20 (a)	A12 - Teville Gate	<p>Amend paragraph 4.36:</p> <p>4.36 There has been an aspiration to redevelop this prime site for a number of years and various schemes have been proposed. The latest application seeks sought to deliver a mixed use scheme comprising three blocks of 378 residential units; and a range of other uses such as an 80-bedroom a hotel, a foodstore, a cafe and a gym. In addition, the proposal would provide retail, restaurant and cafe uses, service areas, 300+ parking spaces, public realm with associated hard and soft landscaping and private amenity spaces. More recently, it has become apparent that this scheme was unlikely to be implemented. Therefore, to control the destiny of this key development opportunity and ensure it is developed Worthing Borough Council has now completed the purchase of the site. Detailed feasibility and viability assessments are being undertaken to ensure that the site delivers the most appropriate mix and capacity of uses.</p>	To reflect progress made on the site, ensure the wording is effective, and in response to MIQ-123.
M21	A13 - Titnore Lane	There are currently two criterion b). This should be corrected so that the development requirements run from a) to j) rather than from a) to i) as currently shown.	Correct Typo
M22	A13 - Titnore Lane	<p>Paragraph 4.37 - add sentence (after 1st sentence) as follows:</p> <p>.....the west and north. Titnore Lane itself is a strategic connection to the wider network of the A280 (via Clapham) and the A27. The site is</p>	In response to SDWLP-61 (WSCC)
M23	A13 - Titnore Lane	Amend criterion e) as follows: '.....gain in biodiversity. Any new green corridors should be of sufficient nature and scale to be effective routes for wildlife. Any new trees removed.....'	In response to SDWLP-73 (SDNPA) and to correct a typo.
M24	A13 - Titnore Lane	<p>The following modification is proposed to development requirement h):</p> <p>h) Adopt the sequential approach to site layout so the most vulnerable development types are located in the areas of lowest flood risk first, taking account of all sources. Should any development classified as a more vulnerable use be located in Flood Zone 3 the Exception Test must be applied. A Flood Risk Assessment should demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall;</p>	In response to SDWLP-59 (Environment Agency)
M24 (a)	A14 - Union Place	Amend 'Indicative Capacity' as follows:	For consistency and in response to

		<ul style="list-style-type: none"> 150 residential units and & 700 sqm leisure / commercial 	Inspector's Initial Question 17 (Ref-IL01)
M24 (b)	A15 - Upper Brighton Road	<p>Maps (Page 100): Amend the red line boundary for the site to exclude the playing field (amend legend accordingly).</p> <p>Amend paragraph 4.43: Bramber Primary School (and playing field) is located adjacent to the south west and an area of land within the site is reserved for for an expansion of the school to provide a playing field.</p> <p>Delete development requirement n): -n) provide playing field for Bramber First School</p> <p><i>Note - as a consequence of this Modification existing criteria o) p) and q) will now become criteria n), o) and p).</i></p>	For clarity, to ensure that the policy is effective and up-to-date and in response to MIQ-133
Chapter 5 - Development Management Policies			
M25	DM1 - Housing Mix	<p>Amend the end of paragraph 5.4 to remove the following:with disabilities —it is not specialist housing for one group of people but housing for all</p> <p>Amend the last sentence of paragraph 5.14 as follows: Options include retirement living or sheltered housing (housing with support), and extra care housing or housing with care (both classed as C3 dwellings) and residential care homes and nursing homes (care bed spaces classed as C2 provision).</p> <p>Amend the first sentence of paragraph 5.15 as follows: Provision of housing with care (C3 use class) Sheltered and extra care housing are alternatives is an alternative to care/nursing home bed spaces and can help...</p>	In response to SDWLP-62 (The Planning Bureau on behalf of McCarthy & Stone)
M26	DM1 - Housing Mix	<p>Amend criterion a) as follows:</p> <p>a) In order to deliver sustainable mixed and balanced communities, the Council will expect all applications for new housing to consider the most up to date evidence of housing needs and demands to help determine the most appropriate housing mix based on the character and location of the individual site.</p>	In response to SDWLP-49 (ECE on behalf of St Williams) and SDWLP-54 (WSP on behalf of NewRiver) and SDWLP-60 Rapleys (On

			behalf of EM Goring Ltd)
M26 (a)	DM1 - Housing Mix	Amend Criterion c): c).... The Council will expect all new build dwellings to meet the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings unless it can be demonstrated it is impractical and unachievable.	To ensure the Plan is effective and justified and in response to MIQ-53
M26 (b)	DM1 - Housing Mix	Insert new criterion g): g) When considering proposals for individual live/work units, the workspace should be designed to be functionally separate from the dwelling(s) to which it relates. The proposal will need to comply with criterion d) of Policy DM2 and affordable housing provision under Policy DM3: Affordable Housing. It is considered appropriate to remove paragraph 5.25 to avoid repetition as this is now included in criterion g) of the policy. Para 5.25 Live/work units will be required to comply with the space standard requirement under Policy DM2: Density and affordable housing provision under Policy DM3: Affordable Housing.	To ensure the Plan is effective and justified and in response to MIQ-54
M26 (c)	DM2 - Density	Add wording to the end of criterion c) as follows: per hectare. Lower densities will only be acceptable if it is demonstrated that development viability would be compromised or this is necessary to ensure the development is compatible with its surroundings and / or proposed mix of uses.	For consistency, to ensure that the policy is effective and in response to MIQ-61 & MIQ-62
M27	DM5 - Quality of the Built Environment	Add sentence to paragraph 5.64 as follows: ".....likely to continue. To ensure that efficient use is made of available land the Council will positively consider applications for tall buildings on sites that can appropriately accommodate buildings of height. Whilst this form...."	In response to SDWLP-54 (WSP on behalf of NewRiver)
M28	DM5 - Quality of the Built Environment	Amend policy criteria as follows: ii) enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping, tree canopy , impact on street	To strengthen policy and in response to SDWLP-58 (Woodland Trust)

		<p>scene and layout of the development;</p> <p>viii) not have an unacceptable impact on the occupiers of adjacent properties, particularly of residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook, an unacceptable increase in noise giving rise in significant adverse impacts, or vehicular movements resulting in severe cumulative impacts on the road network, or loss of important open space of public value (unless it satisfies any of the exceptions set out under Policy DM7 – Open Space, Recreation and Leisure);</p> <p>ix) respect the existing natural features of the site, including landform, trees and biodiversity and contribute positively to biodiversity net gain. Where appropriate, this will include the protection and integration of existing trees and green infrastructure into new developments;</p>	<p>(ii and ix) and SDWLP-60 (Rapleys on behalf of EM Goring Ltd) (viii)</p>
M28 (a)	DM5 - Quality of the Built Environment	<p>Add new sentence to the end of paragraph 5.59 as follows:</p> <ul style="list-style-type: none"> To provide maximum clarity about design expectations at an early stage the Council must prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. <p>Paragraph 5.72 - add the following text to the end of the paragraph:</p> <p>Furthermore, the Council will progress a Supplementary Planning Document that establishes a design guide and code for Worthing that takes into account the guidance contained in the National Design Guide and the National Model Design Code. This will help to provide a local framework for creating beautiful and distinctive places that deliver a consistent and high quality standard of design. The codes that will reflect local aspirations will be informed by effective community engagement.</p> <p>Para 5.73 - Add the following to the list of documents:</p> <ul style="list-style-type: none"> National Model Design Code (June 2021) <p>Add new subheading and criterion at the end of Policy DM5:</p> <p>Ensuring Good Design</p> <p>d) Development must reflect government guidance on design and take into account any local design guidance and supplementary planning documents such as design guides and codes. Weight will be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally, so long as they fit in with the overall form and layout of their surroundings.</p>	<p>In response to revised NPPF (July 2021) - Paragraphs 127 / 128 / 129 / 134</p>

M28 (b)	DM5 - Quality of the Built Environment	<p>Revise criterion C) as follows:</p> <p>c) To ensure that the quality of approved development is not materially diminished between permission and completion, where appropriate, the Council will use Planning Conditions to prevent incremental changes being made to approved plans resist subsequent planning applications that would impact negatively on the design and quality of the approved scheme proposed.</p>	Corrected - the use of conditions (as previously worded) would be ultra vires in that they cannot pre-judge how the Council deals with subsequent planning applications.
M28 (c)	DM5 - Quality of the Built Environment	<p>Amend criterion iv) as follows:</p> <p>iv) where appropriate, respect, preserve and enhance heritage assets and settings.</p>	For clarity, to ensure that the policy is effective and in response to MIQ-162
M29	DM6 - Public Realm	<p>Amend criterion e) as follows:</p> <p>e) Express consent will only be granted for advertisements which respect the character and appearance of the surrounding area, and do not create a danger or hazard to public safety. Where an illuminated advertisement is acceptable in principle, such advertisements should be either externally illuminated or have internally illuminated individual lettering with a solid or opaque background.</p>	In response to SDWLP-20 (British Sign & Graphics Association)
M30	DM7 - Open Space, Recreation & Leisure	<ul style="list-style-type: none"> Para 5.100 - Table 1 - add in a new row. Insert: 'Accessible Natural Green Space (ANGS)' - under Typology heading '1.0 (for new provision only)' - under Quantity Standards Heading. '960 metres / 20 minutes & ANGS Standards for ANGS above 20ha' - under Access Standard heading 	<p>The standard for ANGS was inadvertently omitted.</p> <p>In response to SDWLP-58 (Woodland Trust)</p>
M30 (a)	DM7 - Open Space, Recreation & Leisure	<p>Amend supporting text paragraph 5.101:</p> <p>5.101 - ...The potential to make off-site contributions will be considered on a case by case basis. Further guidance on the application of open space quantity and access standards is set out within the Open Space, Recreation &</p>	To ensure the policy is effective and in response to MIQ-188

		Leisure Guidance Note (2021).	
M31	DM7 - Open Space, Recreation & Leisure	Amend criterion a) as follows: a) Schemes of 10+ dwellings will be required to provide open space on site in accordance with the Council's adopted standards (as set out within The Open Space Study (2019) applying occupancy levels based on the size of dwellings proposed) . Where it is not possible to provide open space on site, contributions will be sought to provide or improve open space off-site within the ward or nearby ward to which the development is located unless surplus provision exists locally .	To provide clarity and in response to SDWLP-49 (ECE on behalf of St Williams)
M32	DM7 - Open Space, Recreation & Leisure	Amend criterion b) as follows: b) Proposals incorporating leisure/recreation facilities should use the findings of the Sport, Leisure and Open Space Study (or any future updated study) to inform the types required.	To provide clarity and in response to SDWLP-60 (Rapeleys on behalf of EM Goring Ltd)
M32/0	DM8 - Planning for sustainable communities / community facilities	Amend criterion e) as follows: i) an accessible replacement facility of a similar nature is provided that meets the needs of its current and intended users, as well as the local community; or	For clarity, to ensure that the policy is effective and in response to MIQ-153
M32/1	DM9 - Delivering infrastructure	Amend criterion c) as follows: c) Infrastructure should be provided at the appropriate time, usually this will be prior to the....	For clarity, to ensure that the policy is effective and in response to MIQ-156
M32/2	DM9 - Delivering infrastructure	Add the following criterion to policy DM9 (and delete corresponding text from paragraph 5.123): f) If full mitigation measures and contributions are not able to be delivered the development will only be permitted where: i) the applicant has submitted a viability appraisal that has been produced in accordance with national guidance, and has been assessed by the Borough Council as appropriate and based on reasonable assumptions;	For clarity, to ensure that the policy is effective and in response to MIQ-155

		<p>ii) the value of the planning obligations has been maximised having regard to likely viability;</p> <p>iii) where appropriate, a clawback mechanism has been incorporated into a legal agreement to ensure that additional mitigation is provided if final development viability is better than anticipated in the viability assessment; and</p> <p>iv) if following a viability assessment process the benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations.</p> <p>Para 5.123 ...The developer will need to demonstrate how this would threaten delivery of the development. If full mitigation measures and contributions are not able to be delivered the development will only be permitted where:</p> <p>a) the applicant has submitted a viability appraisal that has been produced in accordance with national guidance, and has been assessed by the borough council as appropriate and based on reasonable assumptions;</p> <p>b) the value of the planning obligations has been maximised having regard to likely viability;</p> <p>e) where appropriate, a clawback mechanism has been incorporated into a legal agreement to ensure that additional mitigation is provided if final development viability is better than anticipated in the viability assessment; and</p> <p>d) if following a viability assessment process the benefits of the development outweigh the lack of full mitigation for its impacts, having regard to other material considerations.</p>	
M32/3	DM12 - The visitor economy	<p>Revise the second sentence of criterion b) as follows:</p> <p>To demonstrate these requirements, the Council will apply the following tests with more detailed advice included in its Sustainable Economy Supplementary Planning Document: including the following</p>	For clarity, to ensure that the policy is effective and in response to MIQ-83
M32/4	DM13 - Retail and town centre uses	<p>Amend paragraph 5.175:</p> <p>'As mentioned above , changes made at the national level have, in effect, increased the ability for changes to be made between use classes land uses within the town centre.'</p>	To ensure the policy is effective and consistent with national policy and in response to MIQ-139.
M32/5	DM13 - Retail	Amend heading to Paragraph 5.194 Page 143:	To ensure the

	and town centre uses	<p>Applicable to all Centres Drinking establishments (A4) and takeaway establishments (A5)</p> <p>Make the following amendments within Policy DM13 (Retail and Town Centre Uses)</p> <p>Amend 2nd sentence of d)i) as follows:</p> <p>Uses such as Drinking Establishments (A4) and takeaways (A5) together with other uses that would detract from the overall shopping function of the frontage will be resisted;</p> <p>Amend 2nd sentence of d)ii) as follows:</p> <p>However, uses such as takeaways (A5) and uses with closed and inactive street frontages will be resisted.</p> <p>Amend 2nd sentence of d)iii) as follows:</p> <p>However, uses such as takeaways (A5) and uses with closed and inactive street frontages will be resisted. particularly where they cause or contribute to an over-concentration of such uses.</p> <p>Amend 1st sentence of g) iii) as follows:</p> <p>in all District and Local Centres drinking establishments (A4) and takeaways (A5) uses will be considered on their merit.....</p>	policy is effective and consistent with national policy and in response to MIQ-148.
M32/6	DM13 - Retail and town centre uses	<p>Amend the first line of criterion d) i):</p> <p>d) i) Primary Shopping Frontage (PSF) - will be the focus for retail uses within the centre. The Council will seek to retain 65% of units in retail use and the loss of retail uses will be resisted.....'</p>	To ensure that the policy is consistent and effective and in response to MIQ-144
M32/7	DM14 - Digital infrastructure	<p>Add text to the end of paragraph 5.203:</p> <p>5.203 - ...cost implications. With this in mind, West Sussex County Council and Worthing Borough Council have a strategic aim to densify full fibre infrastructure to serve premises and support future technologies such as 5G. West Sussex County Council has prepared guidance on Digital Infrastructure</p>	To ensure that the policy is effective and up-to-date and in response to MIQ-159

		which should be used to inform future proposals. The Council will also prepare a revised Guide to Residential Development SPD which will provide further details on relevant issues to be considered by applicants.	
M32/8	DM14 - Digital infrastructure	Revise first line of criterion g) as follows: g) All relevant proposals (including prior approvals) will need to submit:	To ensure that the policy is effective, consistent with national policy and in response to MIQ-160
M32 (a)	DM15 - Sustainable transport & active travel	Amend 2nd sentence of paragraph 5.223 as follows: When considering applications, proposals must comply with the have regard to criteria contained in Worthing Borough Council's and West Sussex County Council's planning and guidance documents relevant to design, car cycle parking and electric vehicle charging points, or any other appropriate national standard. Amend Policy DM15 criterion iv) as follows: iv) requiring new development to provide for an appropriate level of cycle parking , car parking and electric vehicle space allocations that takes into consideration the impact of development upon on-street parking and accords with has regard to West Sussex County Council standards / guidance, the location of development and measures to encourage more sustainable modes of transport.	In response to Inspector's Initial Questions 27 & 28 (Ref-IL01) and to help clarify how the WSCC parking standards will be applied.
M32 (b)	DM15 - Sustainable transport & active travel	At new criterion at end of policy: b) viii) ensure the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.	In response to revised NPPF (July 2021) - Paragraph 110
M33	DM16 - Sustainable Design	Replace criterion b) with the following: b) All new build housing will achieve a minimum 31% CO2 reduction, compared to the Building Regulations Part L 2013 standard, through carbon saving technology and fabric improvements in line	To ensure requirements remain consistent

		<p>with the energy hierarchy. New non-domestic buildings will achieve a 27% improvement in CO2 on average per building compared to the current Part L 2013 standard. This should be delivered through very high fabric standards, improved services and low carbon technologies in line with the energy hierarchy.</p> <ul style="list-style-type: none"> • Delete criterion c) as this is now covered by the amendments to criteria b) above and other requirements within Policy DM16. • Amendments above will necessitate the need to revise the existing references d) to j). 	<p>with the emerging standard.</p> <p>In response to SDWLP-49 (ECE on behalf of St Williams)</p>
M33 (a)	DM16 - Sustainable Design	<p>Amend criterion a):</p> <p>a) All development (excluding householder applications) will be required to achieve the relevant minimum standards below unless superseded by national planning policy, or Building Regulations, or it can be demonstrated that it is not practicable, feasible or viable (in which case the minimum standard should be met as far as is possible) Applications for major.....</p>	<p>To ensure the policy is effective and in response to MIQ-174</p>
M34	DM17 - Energy	<p>Delete criteria a) - and then renumber all criteria.</p> <p>Amend (existing) criterion c) as follows:</p> <p>c) Major development within areas identified as heat network opportunity clusters, will be required to connect to district heating networks where:</p> <p>i) they exist at the time of permission being granted ii) where the heat network route lies adjacent to the site iii) where otherwise it is feasible and viable to do so. or will be expected to maximise opportunities for the development of a future district heating network. Alternatively, where a heat network route is planned but has not been delivered, sites adjacent to the planned heat network routes should be required to be heat network ready to enable a future connection.</p>	<p>In response to SDWLP-49 (ECE on behalf of St Williams)</p>
M35	DM18 - Biodiversity	<p>Amend first sentence of para 5.259 as follows:</p> <p>"Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats after avoiding or mitigating harm as far as possible and is in addition to any compensation identified. The Environment Bill....."</p>	<p>In response to SDWLP-57 (Sussex Wildlife Trust)</p>

M35 (a)	DM18 - Biodiversity	Amend supporting text 5.259: This requires developers to demonstrate that at least a 10% gain has been achieved using DEFRA's Biodiversity Metric 2-0 3.0	To ensure the policy is consistent with national policy and in response to MIQ-192
M36	DM18 - Biodiversity	Amend criterion h) as follows: h) New developments (excluding change of use and householder) should must provide a minimum of 10% net gain for biodiversity - where possible this should be onsite. Where it is achievable, a 20%+ onsite net gain is strongly encouraged and is required for development on previously developed sites. Major developments will be expected to demonstrate this at the planning application stage using biodiversity metrics. This should be accompanied by a long term management plan.	In response to SDWLP-103 (Natural England)
M37	DM19 - Green Infrastructure	Amend criterion c) as follows: c) In all new developments there should be no net loss of trees and any trees removed should usually be replaced on a greater than 1:1 basis to support maintain current support maintain current levels of canopy cover and contribute to biodiversity net gain . Additional tree planting is encouraged where appropriate to improve the quality of the local environment, and increase appropriate species the canopy cover with native species. Where possible, tree stock should be UK sourced and grown.	To strengthen policy and in response to SDWLP-58 (Woodland Trust)
M37 (a)	DM19 - Green Infrastructure	Amend the second sentence of paragraph 5.271 as follows: The National Design Guide and National Model Design Code recognises the importance of trees and landscaping in new development; and sets out how landscaping, including streets should be being tree-lined wherever possible., will be considered as part of the forthcoming National Model Design Code.	In response to revised NPPF (July 2021) - Paragraph 131
M38	DM20 - Flood Risk and Sustainable Drainage	First sentence of Para 5.282 to be amended as follows: Opportunities should be sought to reduce the causes and impacts of flooding where appropriate through the use of appropriate flood resilience and resistance measures, and natural flood management techniques....	To add clarity and in response to SDWLP-13 (Steve Limbrey)
M39	DM20 - Flood Risk and Sustainable Drainage	Amend the first part of criterion d): The surface water drainage scheme should use Sustainable Drainage Systems and where practicable and viable be designed to:	In response to SDWLP-49 (ECE on behalf of St Williams)

M39 (a)	DM20 - Flood Risk and Sustainable Drainage	<p>DM20 - Amend sections a) / b) iii) / c) i) and add new criterion c) v):</p> <p>a)Development should be directed away from areas of highest risk of flooding from any source and opportunities...</p> <p>b) iii) all new development (including change of use to that would introduce a more vulnerable class) on land at increased flood risk in future or subject to other sources of flooding identified by the Strategic Flood Risk Assessment</p> <p>c) i) the site has passed the sequential test (considering all sources of flood risk) and within the site the most vulnerable development is located in areas of at lowest flood risk from any source unless there are overriding...</p> <p>c) v) development should be appropriately flood resistant and resilient so in the event of a flood it can be quickly brought back into use without significant refurbishment.</p>	In response to revised NPPF (July 2021) - Paragraph 162 / 167 and new footnote 55
M39 (b)	DM20 - Flood Risk and Sustainable Drainage	<p>Insert an additional criteria between c) i) and c) ii) with c) ii) being renumbered to c) iii):</p> <p>c) ii) Highly vulnerable development in areas with a medium probability of flooding or more vulnerable or essential infrastructure in areas with a high probability of flooding from all sources will need to apply and demonstrate that both parts of the exception test have been passed:</p> <p>a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and</p> <p>b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</p> <p>ciii) development will be safe for its lifetime taking into account the vulnerability of users, considering current and future flooding from all sources, including in-combination and cumulative risks, and any residual risk can be safely managed.</p> <p>Amend supporting text 5.280 to avoid duplication:</p> <p>5.280... For the exception test to be passed both elements should be satisfied. It should be demonstrated that:</p> <p>a) The development would provide wider sustainability benefits to the community that outweigh flood risk; and</p> <p>b) The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere and where possible, will reduce flood risk overall.</p>	To ensure the policy is effective, consistent with national policy (responding to 2021 NPPF update) and in response to MIQ-181
M39 (c)	DM20 - Flood	Amend criterion d):	To ensure the

	Risk and Sustainable Drainage	d) The Surface water drainage scheme should use Sustainable Drainage Systems, <u>unless there is clear evidence that this would be inappropriate</u> , and be designed to:	policy is effective and in response to MIQ-182.
M40	DM21 - Water Quality and Sustainable Water Use	<ul style="list-style-type: none"> Change policy text box as follows: 'Water Quality and Protection' <u>'Water Quality and Sustainable Water Use'</u> 	For consistency - to ensure the name for policy DM21 is the same as the start of the section and contents etc.
M40 (a)	DM21 - Water Quality and Sustainable Water Use	<p>Amend criterion b):</p> <p>b) <u>The Council will support proposals</u> Opportunities should be taken, where appropriate, to replace existing <u>traditional</u> drainage systems with suitable sustainable drainage systems to further reduce water pollution and improve water quality.</p>	To ensure the policy is effective and in response to MIQ-184.
M41	DM22 - Pollution	<ul style="list-style-type: none"> Para 5.313 - Insert: <u>Planning Noise Advice Document: Sussex (March 2021)</u>. 	To recognise new guidance
M42	DM22 - Pollution	<ul style="list-style-type: none"> b) New development in Worthing will be located in areas most suitable to the use of that development to avoid <u>unacceptable</u> risks from all sources of pollution. d) Where appropriate, air quality, and/or noise <u>and lighting assessments</u> will be required to support planning applications. These should be undertaken in accordance with the most up to date guidance and have regard to any relevant action plans. Reword criterion e) <u>Where there is potential risk of contaminated land, proportionate investigations and assessments will be required in relation to relevant development proposals. These should assess the nature and extent of contamination and the potential risks to human health, adjacent land uses and the local environment.</u> 	To address amendments suggested by SDWLP-60 (Rapleys on behalf of EM Goring Ltd)
M42 (a)	DM24 - The historic environment	<p>Revise criterion c) as follows:</p> <p>Development should not adversely affect the setting of heritage assets. <u>Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, the Council will</u></p>	For clarity, to ensure that the policy is effective, consistent with

		<p>refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Where proposals may result in harm to a designated asset Where a proposed development would lead to substantial harm to, or total loss of a designated heritage asset, a Heritage Impact Assessment must be submitted describing the significance of any heritage assets affected, including any contribution made by their setting.</p>	national policy and in response to MIQ-171 (ii)
M42 (b)	DM24 - The historic environment	<p>Add the following sentence to the end of criterion g):</p> <p>Where proposed development may impact negatively on an undesignated heritage asset the Council will, where appropriate, require a Heritage Impact Assessment which will help to inform the determination of the application.</p>	For clarity, to ensure that the policy is effective, consistent with national policy and in response to MIQ-171 (i)
Glossary			
M42 (a)	Green Infrastructure	<p>Replace existing definition with the following:</p> <p>A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.</p>	In response to revised definition set out in the NPPF (July 2021)
Acronyms			
Proposals Map			
M43	Policy SS5 - Local green gaps	<ul style="list-style-type: none"> The boundary to (c) Brooklands Recreation Area and abutting allotments should be amended to exclude land within Southern Water's ownership. (See separate mapping extract) 	In response to SDWLP-43 (Southern Water)

M44	Policy DM11 - Protecting and enhancing employment sites	<ul style="list-style-type: none"> Amend the Broadwater Business Park Employment Area designation to include this part of the GSK operational site (see separate mapping extract). 	In response to SDWLP-42 (Lichfields on behalf of GlaxoSmithKline Plc)
M45	Policy DM11 - Protecting and enhancing employment sites	<ul style="list-style-type: none"> Amend the Broadwater Business Park Employment Area designation to include the Decoy Farm allocation (A5) (see separate mapping extract). 	To ensure that the Proposals Map reflects and responds to the proposed allocations
M46	Image on pages 61 & 63	<ul style="list-style-type: none"> Amend the boundary of the Local Green Space and Local Green Gap designations so that they do not extend onto beach / coastline / sea. 	To ensure consistency with Proposals Map
M47	A15 - Upper Brighton Rd	Revised the 'red line' boundary in the south west of the site to exclude the area shown as 'Land Reserved for Playing Field'	For clarity, to ensure that the policy is effective and up-to-date and in response to MIQ-133
Appendices			
M48		<ul style="list-style-type: none"> Add housing trajectory 	To ensure that the WLP is consistent with national policy and in response to MIQ-43