The Executive Summary

Worthing Borough Council is currently consulting the County Council, other stakeholders and the public on their Submission Core Strategy, Publication Version (Reg 27) and Infrastructure Delivery Plan (IDP) – April 2010. These documents follow on from the Revised Core Strategy Consultation Document of June 2009, and form part of a suite of Local Development Framework (LDF) documents that aim to govern the long term spatial planning of the District. A draft Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) also accompanies these Development Plan Documents (DPD); comments can also be made on this document.

Publication of a development plan document (Regulation 27)

Before a local authority submits a development plan document to the Secretary of State, it must publish and make available the documents it proposes to submit. The publication of the draft development plan document should be informed by earlier extensive public participation to ensure that what the local authority publishes is sound. It should be justified (i.e. founded on a robust evidence base and the most appropriate strategy when considered against the reasonable alternatives) and effective (i.e. deliverable, flexible and able to be monitored). This will make it less likely that matters will be raised which have not been the subject of previous representations.

The Submission Core Strategy (SCS) sets out the District’s proposed policy on proposed development sites. Once adopted, this DPD will identify land for housing in the most sustainable locations in order that the Borough Council is able to meet its housing requirements up to 2026. As the title suggests, the IDP sets out what infrastructure is required to deliver these allocations.

Consultation on these documents runs until the 8th June 2010. Comments received by the Borough Council will be analysed and considered and presented to an inspector for public inspection in autumn 2010.

The draft DPD has been considered against policies; the West Sussex Waste Local Plan Revised Deposit Draft 2001-2016 (July 2004), the West Sussex Minerals Local Plan 2003, the emerging West Sussex Minerals and Waste Development Framework and the West Sussex Transport Plan 2006-2016.
It is vital that the needs of the County Council as a service provider have also been considered. At this stage, no major issues have been identified. Various changes, recommendations and comments are raised in respect of the suggested sites, and these are set out in Appendix A to this report. In addition recommended changes to the IDP are also highlighted.

Recommendation:

That the Cabinet Member for Environment and Economy approves the comments in Appendix A to this report as the County Council’s formal response to the consultation.

1. **Background**

1.1 Worthing Borough Council (WBC) is preparing a series of Local Development Framework (LDF) documents that will help to guide development within the District in the period up to 2026. The LDF contains advice and guidance on how development should take place, and sets out locations where housing, employment and leisure development should be built over the coming years.

1.2 One such document is the Submission Core Strategy (SCS). Once adopted, this document will identify a number of development sites. The Infrastructure Delivery Plan (IDP) identifies the method for their release including infrastructure requirements.

1.3 WBC is currently consulting the County Council and other stakeholders including the public on their latest draft – the Publication Version (Reg 27) – April 2010. This draft follows on from the Revised Core Strategy Consultation Document of June 2009, which the County Council commented on. A draft Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) also accompanies the DPD; comments can also be made on this document.

1.4 The consultation runs until the 8th June 2010.

2. **The Consultation Documents**

2.1 Below is a brief summary of the Submission Core Strategy options and the associated draft Sustainability Appraisal/Strategic Environmental Assessment Report (SA/SEA).


2.2 The SCS identifies the following potential development sites:

<table>
<thead>
<tr>
<th>Suggested site</th>
<th>Proposed number of dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aquarena – Development principles: mixed-use scheme</td>
<td>Unknown</td>
</tr>
<tr>
<td>Which might include leisure (swimming</td>
<td></td>
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</tbody>
</table>
pool), café/restaurants, residential supporting retail and leisure.

**Marine Parade – Development principles:** Unknown

**Stagecoach site**
- mixed use site which might include retail, residential and cultural uses.

**Grafton site – Development principles:** Potentially 250

**Comprehensive mixed-use Development which may incorporate retail, leisure and residential.**

**Union Place South – Development principles:** Unknown

**Which might incorporate new modern retail floorspace and high-density residential development.**

**Teville Gate – Development principles:** Approximately 260

**Mixed-use development Which might leisure, residential and supporting retail uses.**

**Newland Street Superstore Site – Development principles:** Unknown

**Possible comprehensive redevelopment to Allow for modern convenience (food retail) floorspace and the potential to incorporate a wider mix of commercial and residential uses and may include potential For a high quality modern office development scheme to provide an active frontage on to Broadwater Road and also Residential.**

**British Gas Site, Lyndhurst Road – Development principles:** Unknown

**Opportunity for mixed residential scheme.**

<table>
<thead>
<tr>
<th>Land adjacent to Martletts Way – Development principles:</th>
<th>Unknown</th>
</tr>
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<tbody>
<tr>
<td>Development principles: Opportunity for mixed use development of employment and residential.</td>
<td>Unknown</td>
</tr>
</tbody>
</table>

| The Warren – Hill Barn Lane – Development principles: N/A |
|--------------------------------------------------------|---------|
| Retention of the site for employment generating uses | N/A |

| The Strand – Development principles: N/A |
|----------------------------------------|---------|
| To secure investment in new education facilities for Worthing College and to enable the refurbishment of the existing office floorspace. | N/A |

| Northbrook College, Durrington and Broadwater Sites – Development principles: | (approximately 100 dwellings) |
| Development principles: On the Durrington site, a mix of high quality residential and employment generating uses supported by any necessary community infrastructure. On the Broadwater site, a residential-led scheme supported by any necessary | |

<table>
<thead>
<tr>
<th>Land adjacent to Martletts Way – Development principles: Opportunity for mixed use development of employment and residential.</th>
<th>Unknown</th>
</tr>
</thead>
<tbody>
<tr>
<td>Development principles: Opportunity for mixed use development of employment and residential.</td>
<td>Unknown</td>
</tr>
</tbody>
</table>
community infrastructure. Development on either sites will require sensitive and innovative design, maximising the gateway locations.

Decoy Farm – Development principles:
Development should provide opportunities to develop new recreational uses that would take advantage of the area’s open spaces. Potential contamination issues will require further investigation and appropriate mitigation measures.

| 2.3 These sites have been selected in accordance with the Borough Council’s objective of promoting a sustainable pattern of development throughout the Borough and are considered to be possibly deliverable in the short to medium term up to 2026. The development of these sites will be subject to the policies set out in the adopted General Development Control Policies (2007), and national policy guidance. |
| 2.4 This consultation stage represents an opportunity for communities and stakeholders to respond to the suggested options. The proposals will be reviewed by the Borough Council in the light of the responses received. |

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

2.5 The purpose of the SA/SEA report is to promote sustainable development through the integration of social, environmental and economic considerations in the preparation of the SCS & IDP. The process involves identifying a set of sustainability objectives by which the success of the SCS and IDP can be measured and monitored. Sustainability Objectives have been used to conduct assessments of the Spatial Objectives and policies. As a result of the assessments the Spatial Objectives and Policies have been altered and improved to increase overall sustainability and, where necessary, mitigation measures have been included to reduce negative effects.

3. Proposed Response

3.1 Both the Submission Core Strategy (SCS) and the Infrastructure Delivery Plan (IDP) have been considered against the West Sussex Waste Local Plan Revised Deposit Draft 2004, West Sussex Minerals Local Plan 2003, the emerging West Sussex Minerals and Waste Development Framework and the West Sussex Transport Plan 2006-2016. In general, the SCS seeks to address relevant issues set out in the County Council’s Plans, and the principles and objectives set out in the document are welcomed. The needs of the County Council as a service provider have been considered, and at this stage, no major issues have been identified. Details will be reassessed again in the future (at the planning application stage) if and when sites come forward for development.

3.2 Various changes, recommendations and comments are made for each of the sites and other sections of the SCS document. These are set out in Appendix A to this report. It is recommended that the comments in Appendix A,
together with this report, be sent to Worthing Borough Council as the County Council’s formal response to the consultation documents.

4. **Consultation**

Consultations have taken place with all local Members in the Worthing electoral divisions; the Cabinet Member for Environment and Economy and the then Deputy and Advisers to the former Cabinet Member for Strategic Planning and Transport; and with officers in the Infrastructure Division. Additionally, comments were sought from the following service units: West Sussex Fire and Rescue Service, Property Services, Wastes Management, Children and Young People’s Services and Adults’ Services. Any comments received are reported in Appendix A to this report.

5. **Resources Implications and Value for Money**

There are no resource implications in making this response. Resource issues will arise as the development progresses and will be addressed in detail then.

6. **Risk Management Implications**

The Core Strategy Submission will be the policy document and the Infrastructure Delivery Plan (IDP) will be the delivery mechanism for development and use of land at specific locations. It is therefore important that the County Council is involved as a key stakeholder in the preparation of this DPD to ensure that the County Council’s role as a community leader and needs as a service provider are met.

7. **Crime and Disorder Act Implications**

There are no identifiable Crime and Disorder Act implications.

8. **Human Rights Act Implications**

This Council, together with the Borough and District Councils, have a positive obligation to ensure that respect for human rights is at the core of their day to day work and must, in particular, consider Article 6 (Determination of Civil Rights), 8 (A Right to Family Life, etc.) and Article 1 of the First Protocol (Right to Property). The preparation of a local development document such as this DPD and the involvement of the community and stakeholders, at each stage, will potentially contribute to improving the quality of life in this specific area and will therefore have a positive impact on human rights.

9. **Customer Focus Appraisal**

Customer Focus Appraisal (CFA) is not required for this decision. This is because the CFA process should be applied to services/policies that the County Council is developing/reviewing or implementing. As the County Council is not the owner of the consultation document, there would be no requirement for a CFA to be carried out.

**Julian Harris**
Director of Operations – Infrastructure

**Duncan Barratt**
Service Manager – Local Development
Appendices

Appendix A - Proposed West Sussex County Council response to Worthing Borough Council on their Submission Core Strategy Publication Version (Reg 27) and Draft Infrastructure Delivery Plan (IDP) – both April 2010, Development Plan Document (DPD) consultations.

Background Papers

Worthing Borough Council’s Submission Core Strategy Publication Version (Reg 27) and Draft Infrastructure Delivery Plan (IDP) – both April 2010.

The South East Plan, May 2009

West Sussex Minerals Local Plan 2003.


The emerging West Sussex Minerals and Waste Development Framework.

West Sussex Local Transport Plan 2006-2016.

Infrastructure Schedule (Worthing).

Contact: Tim Townsend, Ext. 77920
Email: tim.townsend@westsussex.gov.uk
Proposed West Sussex County Council response to Worthing Borough Council on their documents:

1. Submission Core Strategy Publication Version (Reg 27) – April 2010; and,

General comments

Both documents have been published to obtain comments from key stakeholders which include local authorities, local businesses and the general public as a whole. The overall aim of the consultation is to test soundness of the documents in order that will satisfy public scrutiny later in the year.

In terms of general suitability, both documents in their introductions make it clear what they seek to do. This is particularly important as recipients/consultees want to know what the documents contain and what they set out to do before reading the full documents.

Essentially, the Submission Core Strategy (SCS) sets out the vision through policies and should be read as a whole as the objectives, policies and targets that have been identified are inter-related. The main components of the SCS are, therefore:

- **A** – Introduction, context and vision.
- **B** – Delivering the vision.
- **C** – Implementation and monitoring.
- **D** – Appendices.

The IDP is an essential component of the spatial planning process and must accompany any Core Strategy documents. A successful IDP will help to:

- Direct the right level of growth and housing development to the right place.
- Target resources to areas of need.
- Bid for funding from other infrastructure agencies.
- Achieve efficiencies in service delivery and development planning.

WSCC comments in response to both documents - starting with the Core Strategy and then concluding with the IDP - are included below. These include points for addition, correction, consideration or information and are marked appropriately. Where no comments are made, this is clearly stated.
**Submission Core Strategy (SCS)**

- **A – Introduction, context and vision.**

**Section 1, Introduction.**

No comments to make.

**Section 2, Characteristics of the Borough.**

**General comment:**
In its approach to the historic environment, the SCS makes little mention of the known archaeology and buried potential or the above ground built heritage of the Borough. In this respect it is disappointing.

There is no discussion of the historical development of Worthing as a resort let alone its more ancient origins and the document makes a serious omission in failing to acknowledge the fact that Cissbury Ring is a scheduled ancient monument under the 1979 Ancient Monuments and Archaeological Areas Act. An Iron Age hillfort, re-fortified in Roman times and re-used again later still as a **burh** in the Anglo-Saxon period as a defence against the Danes (listed in the Burghal Hideage of 919), coins were minted from here from the early 11th century. Within the circuit of the ramparts, at the western end, is an extensive area of Neolithic flint mines very much earlier than the hillfort itself. Elsewhere within the ramparts are a number of other features of Roman and prehistoric date. The site is a distinctive landmark from the air and readily recognisable from the ground. It is a classic textbook example of its type.

For the wider context of Worthing and the archaeological potential of the landscape it is worth looking at a specific study. In November 2008 English Heritage published a research report into data obtainable from the study of air photographs based on an area of the downland north of Worthing. This was a pilot project forming part of a wider scheme known as the National Mapping Programme and the holding land lies adjacent to the western edge of the study area. The report is entitled “**The South Downs NMP Pilot Area 1, Worthing to the Weald**” and available in downloadable form from the English Heritage website by going to:-


The report concluded that Neolithic flint mines, Bronze Age barrows and cross-ridge dykes occupied prominent parts of the South Downs and that there is evidence of large prehistoric and Roman field systems, sometimes integrated with enclosures and trackways, over much of it. This was essentially a desktop study of information which could be interpreted from air photos of open countryside.

Considering the urban built up area a number of further issues need to be considered.
In December 2009, a study of Worthing was produced by as part of the joint West Sussex County Council/ East Sussex County Council and English Heritage initiative to analyse the historic urban settlement in Sussex. This document provides a useful summary of the historical development and also summarises the results of archaeological investigation within Worthing. There is clear evidence for human activity and settlement from prehistoric and Roman times into the early medieval, medieval and later periods. The report should be used as a source of information to set out the background to the origins and development of the town within the core strategy.

The scarcity of land availability for development within Worthing Borough has created a situation whereby larger houses in suburban streets (and in particular their larger rear gardens) are vulnerable to redevelopment with much higher density residential accommodation. Inevitably there is a conflict of interest between older houses with large gardens which do not meet modern criteria in terms of density per hectare and the pressure to meet housing targets. However, the potential casualty of the whole process is the character of the suburban area. In this respect it would be helpful to see discussion of the English Heritage guidance “Suburbs and the Historic Environment” produced March 2007 (available in downloadable form on the English Heritage HELM website).

Unfortunately the Core Strategy is out of date in terms of the latest Planning Guidance on the Historic Environment. PPG15 and PPG16 were superseded by PPS5 in April 2010 and this should be cited in references to policy from now on.

Within PPS5 Worthing should take note of policy HE2. In particular:

2.1 “Regional and local planning authorities should ensure that they have evidence about the historic environment and heritage assets in their area and that this is publicly documented. The level of detail of the evidence should be proportionate and sufficient to inform adequately the plan-making process.”

2.2 “Local planning authorities should maintain or have access to a historic environment record.” (NB the Core Strategy elsewhere refers to the Sussex Biological Record in terms of access to data relating to nature conservation and biodiversity).

2.3 “Local planning authorities should use the evidence to assess the type, numbers, distribution, significance and condition of heritage assets and the contribution that they make to their environment now and in the future. It should also be used to help predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.”

Policy HE3: ‘Regional and Local Planning Approaches’ is also especially relevant –

3.4 “At a local level, plans should consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision in the local development framework core strategy. Heritage assets can be used to ensure continued sustainability of an area and promote a sense of place. Plans at a local level are likely to consider investment in and enhancement of historic places, including the public realm, in more detail. They should include consideration of how best to conserve individual, groups or types of heritage assets that are most at loss through neglect, decay or other threats (see also policy HE5).”
Policy HE5: Monitoring Indicators, states “Local planning authorities should also consider how they can best monitor the impact of their planning policies and decisions on the historic environment. They should pay particular attention to the degree to which individual or groups of heritage assets are at risk of loss or decay, how they expect this will change over time, and how they propose to respond.”

Policy HE7.5 states "Local planning authorities should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use.

Specific point to add/amend:
Page 10 - Paragraph 2.6 – Grove Lodge roundabout has (of March/April 2010) been declared an 'Air Quality Management Area’.

Specific point to add:
Page 16 – The map showing the characteristics of the Borough omits the Scheduled Area and so this will need to be added.

Section 3, Issues and challenges.

Specific point to add:
Page 20, ‘The Historic and Built Environment’ – there is no mention of archaeology (and little about built heritage either). There is much emphasis placed on tourism as a driver of the local economy (and see later 3.22) but no connection is made between the historic environment/ cultural heritage and the part it plays in attracting tourists in the first place – This should be added.

Specific points to add:
Page 20, paragraph 3.17 – No mention is made of the code for sustainable homes. This needs to be added by confirming that level/code 4 will be worked towards.

Page 23, paragraph 3.37 – Mention of attracting high quality retailers but no mention of opportunities to grow green jobs. Opportunity should be taken to mention clean tech industry.

Page 23, paragraph 3.41 - Doesn’t say anything about the opportunities in relation to tourism and climate change e.g. hotter drier summers would mean an increase of visitors to the coast and therefore a positive knock-on for local economy.

Page 27, paragraph 3.60 – No mention is made of DaSTS (Delivering a Sustainable Transport System). This should be included in this paragraph as it is a key piece of work that could ultimately shape the transport system/network for Worthing over the coming years.

Page 27, paragraph 3.61 – No mention of LTP3 – please include.

Section 4, The vision and strategic objectives.

The Vision.

General point to include:
Mention of low carbon should be included in ‘Vision’.

Specific point to consider:
Page 30 - Second paragraph of The Vision ‘box-out’ (final line) is written in past tense. Suggested revision to wording: “The regeneration and delivery of identified key sites outside of the town centre, including a strategic development at West Durrington, will achieve balanced and sustainable growth across the town.”

Specific point to add:
Page 30 - Although referred to later on under ‘Vision’, transport is not mentioned at all in the Vision ‘box-out’. A short paragraph should be added to say that the transport network/system will continue to be improved by a combination of public and private investment, some of which will be brought about by the delivery of key sites forming part of the Core Strategy.

The Strategic Objectives.

Strategic Objective 1 – Protect the natural Environment and Address Climate Change.

Specific point to include:
Page 31 - Strategic Objective 1 appears to deal with Climate change and the natural environment together, however it misses the cross-cutting role in terms of other strategic areas e.g. Objective 2 and tourism (as point before) and Objective 3 - link to low carbon economy.

Specific point to consider:
It seems a bit odd to have an output about another authority – WBC don’t really have any influence over this. Suggest it says that the SDNP is established and WBC is maximising the benefit this can bring to the borough in terms of Green Infrastructure; the public rights of way network; sustainable transport and tourism; biodiversity; connections between the Downs and the coast contributing to a vibrant variety of tourist experiences.

Strategic Objective 2 – Revitalise Worthing’s Town Centre and Seafront.

Specific point to include:
Page 32 – Green infrastructure (GI) should be included in the indicators as the seafront is a huge GI resource as it is linear and outdoor & next to the sea.

Strategic Objective 3 – Deliver a Sustainable Community.

Specific point to include:
Page 33 - Reference to Delivering a Sustainable Transport System (DaSTS) should be added here as some of the aims of DaSTS will contribute to the delivery of sustainable communities.

Strategic Objective 4 – Meet Worthing’s Housing Need.

No comment to make.

Strategic Objective 5 – Reduce Social and Economic Disparities and Improve Quality of Life for All.

Specific points to add:
Page 35, Key Outcomes - Add text on reducing exposure to ambient and indoor noise & poor air quality. In addition, bullet point on community infrastructure
should include reference to ‘healthy lifestyles’ for example, ‘improved pedestrian and cycling routes that will encourage healthy activity, reduce pollution and link and make accessible local facilities and centres.’ (Partly in SO7 however).

**Strategic Objective 6 – Deliver High Quality Distinctive Places.**

No comment to add.

**Strategic Objective 7 – Improve Accessibility.**

Specific point to consider:
Page 37 - Suggest that this be re-titled to; “Improve accessibility and transport”, to better reflect what the objective is about.

**Section B – Delivering the Vision.**

**Section 5, The Spatial Strategy – Where should it happen?**

Specific point to add:

**Mineral Safeguarding.**

MPS1 (para 13) requires Mineral Safeguarding Areas to be shown in LDDs. Once the Minerals and Waste Core Strategy is adopted, WBC will be required to include any safeguarding areas on their adopted proposals map. Minerals Consultation Areas (MCAs) should also be reflected in LDDs. Where a planning application is made for a non-minerals development in an MCA, the Borough should consult WSCC.

(This specific point may need to be included in Appendix 8 – The Proposals Map.)

**Section 6, Delivering the Vision – Enabling Regeneration.**

Specific points to consider:

Page 46, Paragraph 6.1 – No Strategic Objective policies appear for transport (and transport planning), accessibility and protecting the health of the population as part of land use. In addition, Climate change and road-based and other freight movements and related links to the wider economy are not included. It is suggested that these issues are addressed in this section.

**Policy 1 – West Durrington Page 48.**

No comments to make.

**Policy 2 – Areas of Change (generic ‘box-out’) Page 49.**

The need for appropriate infrastructure to support the proposals in each of the areas of change should be highlighted.

The need for a Transport Assessment to support all of the areas of change should be highlighted (it is currently mentioned in Area 12 but not in the others)

**Area of Change 1, Page 50 – Aquarena.**
Specific point to add under ‘Development Principles’:  
Car parking and access by sustainable modes to be key considerations with any re-development proposals.

Specific wording to be added to ‘Objectives’:  
The site is accessible by public transport and its redevelopment may present opportunities to influence or enhance existing and/or new transport infrastructure for the area.

Area of Change 2, Page 51 – Marine Parade: Stagecoach Site.  
No comments to make.

Area of Change 3, Page 52 – Grafton Site.  
Specific points to be changed/added under ‘Development Principles’:  
Bullet point 9 – It is not known whether road surface treatment can be changed between site and Lido until any design and maintenance implications have been fully explored. Therefore, this point should be removed and replaced with reference to promoting pedestrian links and connectivity between the site and seafront.

Car parking and access by sustainable modes of transport to be key considerations with any redevelopment proposals.

Area of Change 4, Page 54 – Union Place South.  
Specific point to be added:  
Reference to satisfactory level of off-street car parking to be provided to be included under ‘Development Principles’.

Area of Change 5, Page 56 – Teville Gate.  
Specific point to add:  
Under ‘Development Principles’, reference/note/bullets must be made to emphasise the need for off-street car parking (including replacement public car parking) to be a key consideration of any redevelopment. In addition, there is also the need to emphasise that any such re-development should improve and/or maximise public transport access to and from the site. Finally, a note to be added to ensure that appropriate supporting highway infrastructure be included in order to manage traffic on surrounding highway network generated by the development.

Area of Change 6, Page 57 – Newland Street Superstore Site.  
Specific point to add:  
Under ‘Development Principles’, add in need to ensure adequate levels of off-street car parking to be provided for all developments on this site. Also, add note to ensure that as a consequence of any redevelopment, adequate levels of car parking provision remains for the existing Morrisons store – in line with their, or any future occupier’s requirements.

Area of Change 7, Page 58 – British Gas Site, Lyndhurst Road.  
No comments to make.
Area of Change 8, Page 59 & 60 – Land Adjacent to Martletts Way.

Specific point to be changed:
Under ‘Challenges and Solutions’, the penultimate sentence makes reference to options for access. This should be changed slightly to read: “Based on SHLAA scenarios and assessments, options for access arrangements that could be considered could be...(etc)”

Specific point to be changed:
Under ‘Development Principles’, delete the word ‘green’ from in front of travel plan.

Area of Change 9, Page 61 – The Warren, Hill Barn Lane.

Specific point to add:
Under ‘Challenges and solutions’, reference should be made to Grove Lodge roundabout being an ‘Air Quality Management Area’.

Specific point to change:
Under ‘Challenges and solutions’, the second sentence of the third paragraph should be changed to read: “The current road congestion and severance issues ...(continue as written)”.

Specific point to add:
Under ‘Challenges and solutions’, no reference is given to possible consideration of the site as an educational establishment or for educational and/or recreational/leisure purposes. Whilst an employment use may be the Borough Council’s preferred (or initial) option for the site, WSCC respectfully request that education and/or recreational/leisure uses on the site should not be disregarded. However, any development on the site would be subject to promotion and implementation of a satisfactory package of transport measures with strong emphasis on travel and access by non-car modes.

Specific point to be changed:
Under ‘Development Principles’, the final bullet point should be changed to read: “Promotion and implementation of a range of sustainable transport measures with strong emphasis on travel and access by non-car modes, as part of an overall package of transport measures, will be key to facilitate development on the site.”

Area of Change 10, Page 62 – The Strand.

Specific point to add:
Under ‘Development Principles’, add bullet point to say that any redevelopments should provide adequate levels of car parking and should also contribute to sustainable transport measures in the locality (to promote this as an alternative to the car).

Area of Change 11, Page 64 – Northbrook College, Durrington and Broadwater Sites.

Specific point to add:
Options are currently being considered for the Coastal Transport System (CTS) project and potential Park & Ride opportunities are being considered for the town to support the development of options along the A27 corridor. This may be a suitable site for the west of the town as it is a gateway to the town. Use of part of the site
as a Park & Ride facility would also make the site more sustainable as a residential, employment and education site by making it more accessible. We suggest that the wording is amended to reflect the opportunities that this site could present if it could be developed in the future.

**Area of Change 12, Page 66 – Decoy Farm.**

**General comments:**
We agree that site access issues need to be suitably addressed in order to unlock the potential of this site. Suitable access arrangements should be planned through discussion with the County Council and will need to have regard to their deliverability and suitability from a policy context.

**Specific point to add under ‘Objectives’:**
This site was identified in the Strategic Waste Sites Allocation DPD (2007) as having potential for a built waste facility. The County Council notes that the area is identified as having potential for a range of uses that will contribute to Worthing’s economy and that it could provide B1, B2 and B8 industrial units. It is considered that a built waste facility would be compatible with the policy for this area and could deliver benefits associated with the collocation of waste facilities. The County Council wish to continue to work with Worthing Borough Council to ensure that the potential for waste uses on this site are fully considered. It is suggested that any conflicts should be reconciled or built into Development Principles.

**Policies.**

**Policy 1, Page 48 – West Durrington.**

No comments to add.

**Policy 3, Page 69 – Providing for a Diverse and Sustainable Economy.**

**Specific comment to add.**
Add bullet to say “Ensuring site locations are well served by a choice of transport mode and where they are not, securing adequate contributions and/or additional infrastructure to address any shortfalls”.

**Policy 4, Page 71 – Protecting Employment Opportunities.**

**Specific points to consider adding:**
Page 72, paragraph 6.41 – “As well as the seafront and town centre the tourism offer of the town goes beyond these areas and includes the South Downs National Park, public parks and gardens and historic buildings. The South Downs National Park is recognised both as both a visitor and recreational asset and the Council will work with the National Park Authority and other stakeholders to strengthen sustainable links to the countryside.” There is no mention of Worthing Museum and Art Gallery which, in regional terms, has an outstanding collection of archaeological and social history material together with a fine collection of art. Worthing also has a long established and active archaeological society which can be taken as a measure of the interest in the subject among the community (even if fails to register with the Core Strategy).
The existing network of waste sites is currently being examined by WSCC as part of the strategic waste site selection process. This will result in the safeguarding of a network of the most suitable waste sites as well as the identification of potential new sites. It is essential that the stock of existing sites are protected from inappropriate neighbouring developments that may prejudice their continuing operation. It is also important to ensure that existing sites are not lost to other forms of development unless there are overriding reasons for their redevelopment (which should be discussed with WSCC). In this respect, Policy 4 of the Core Strategy, to protect existing employment uses is welcome. Industrial estates can also provide opportunities for new waste management facilities and the County Council would be happy to work with Worthing Borough Council on subsequent LDDs in developing its own policy in the Minerals and Waste Core Strategy for waste uses on industrial estates.

**Specific point to add and show on ‘Proposals Map’:**

Once the Minerals and Waste Core Strategy is adopted, Worthing Borough Council must illustrate safeguarded waste sites and waste site allocations on their adopted Proposals Map.

**Policy 5, Page 73 – The Visitor Economy.**

No comments to add.

**Policy 6, Page 76 – Retail.**

**Specific comment to add:**

Under “This will be achieved by” (bottom of page 76), add in reference to need for satisfactory off-street car parking strategy and that all retail areas should be accessible by a choice of transport modes.

**Section 7, Page 78 – Delivering the Vision – Housing and Infrastructure.**

All developments are required to make financial contributions towards waste, education, libraries, fire and rescue services and, where applicable, Total Access Demand (TAD) in line with the County Council’s developer contributions policy.

All developers are encouraged to come forward for pre-application advice prior to submitting a planning application. All developments must be provided with a safe means of access to cater for all modes of travel. A Manual for Streets (DfT, 2007) approach should be adopted for all residential development sites where the speed of traffic is intended to be 30mph or under. However, for roads where the speed limit is above 30mph, Design Manual for Roads and Bridges (DMRB) standards will apply unless otherwise agreed with suitable evidence to support any decision – some examples being road safety audits, design checks/audits and speed surveys etc. All development assessments should take into account committed development locations.

**Policy 7, Page 80, – Meeting Housing Need.**

No comments to add.

**Policy 8, Page 81 – Getting the Right Mix of Homes.**
No comments to add.

**Policy 9, Page 82 – Existing Housing Stock.**

No comments to add.

**Policy 10, Page 84 – Affordable Housing.**

Proposals to ensure appropriate provision of Supported Housing should be made clear.

**Policy 11, Page 87 – Protecting and Enhancing Recreation and Community Uses.**

No comments to add.

**Page 87, ‘New Infrastructure’ – Paragraph 7.40.**

**Specific point to change:**
Reference is made to recognising costs of providing infrastructure and that such costs should not prejudice the delivery of schemes which meet the over-arching spatial objectives. This statement does cause concern because on many occasions, the need for specific infrastructure is vital to deliver certain developments. Without appropriate infrastructure (and contributions thereto), development schemes should not proceed.

**Policy 12, Page 88 – New Infrastructure.**

**Specific point to change:**
Final sentence should finish after the word ‘development’ (i.e. delete wording: “...either on-site or through a financial contribution to off-site provision”).

**Section 8, Page 90, – Delivering the Vision – Sustainable Environment.**

**Page 90 - Natural Environment and Landscape Character.**

**General comment:**
It would be easier for WBC to develop a single ‘Green Infrastructure’ (GI) approach in their LDF to the various elements of the not-built environment. It is such an urban dominated borough that a unified umbrella approach to planning the not-built environment would possibly ease confusion and ensure that all the elements and aspects of GI are broadly covered under one roof.

It is possible (and desirable) that the GI SPD will help to ease this process.

It is encouraging to see that allotment provision is recognised within the LDF.

**Policy 13, Page 92 – Natural Environment and Landscape Character.**

No comments to add.

**Policy 14, Page 94 – Green Infrastructure.**
SEE COMMENTS MADE ABOVE UNDER ‘NATURAL ENVIRONMENT AND LANDSCAPE CHARACTER’.

**Policy 15, Page 96 – Flood Risk and Sustainable Water Management.**

No comments to add.

**Policy 16, Page 98 – Built Environment and Design.**

No comments to add.

**Policy 17, Page 100 – Sustainable Construction.**

*General comments:*
References to waste minimisation, energy and sustainable construction and recycling are welcome.

*Specific points to add:*
For first bullet, need to add air pollution and noise after text in second line that says; “…how it addresses…”

Page 101, paragraphs 8.5 onwards – “Delivering the Vision – Sustainable Environment” - there is no reference to the historic environment *per se* in the Strategic Objectives; section 8.5 again fails to recognise Cissbury Ring as a scheduled ancient monument.

**Policy 18, Page 102 – Sustainable Energy.**

*General comment:*
Reference to the need to consider opportunities for low carbon and renewable energy technologies is welcome. It is considered that this policy would allow for the consideration of a range of renewable and low-carbon technologies, including opportunities to use energy derived from biomass waste, thermal treatment and anaerobic digestion.

**Policy 19, Page 102, Paragraph 8.57 – Sustainable Travel.**

*General comments to consider:*
Almost entirely dwells on road transport (but not including freight), whereas objective 7 is much clearer over the need for integrated transport measures (all modes) including ways make these sustainable and link with other non-transport related sustainable infrastructure provision. Text needs to refer back to Objective 7 to explain.

Policy 19 supporting text dominated by private car use and although this deals with minimising this, it does not cover how this is done.

Need to cover infrastructure requirements of all modes as a result of demands by development (walking, cycling, bus and rail transport, taxis, freight, powered two wheelers, motorcycles etc.). All can benefit the economy, health & environment. E.g. increased walking & cycling will benefit the economy by reducing congestion as well as pollution and enhancing the health of local people.
Bold text main policy is OK in general but needs some update and extra statements/policy line/s.

Strategic Objective 1 includes climate change but as with SO7 the translation of this into Policy 19 is not clear.

Specific points to add:
Air Quality Action Plans are only mentioned in the Appendices - Appendix 1. The action plans mentioned will need to be implemented and will be based on integrated transport solutions and means to protect the health of local people. In order to accommodate development this work will require funding. Main policy needs to say that sustainable travel includes measures to reduce pollution and protect & improve the health of residents (existing and new residents).

Should say something on the lines of: ‘....It is therefore important that the infrastructure needs of all modes are taken account of and implemented as noted in Policy 12, which will allow for improved modal shift to sustainable travel and hence capacity to allow for both new development and an effective transport system.’

Proposed change to bold text of Policy 19: End of first para. before ‘This will be achieved by’: (i.e. protects and/or enhances health, the economy, climate and well being.)

Nothing currently included on freight access to new & existing industry, retail & other business. Update supporting text & policy to allow for this.

Nothing currently included on links with health (e.g. benefits of more walking & cycling instead of short car based trips, health of individuals and cleaner air for all). Update supporting text & policy to allow for this.

Links with LDF and equalities both in regard to transport & transport pollution and non-transport aspects are not apparent and need to be added.

Specific point to change:
Coastal Expressway bus service is now known as ‘Coastal Transport System’ – please amend text accordingly.

Specific point to change:
Final line of paragraph must make it clear that delivery of the key areas above can only be achieved if suitable funding is identified from a range of sources which might include central government grants, developer contributions as well as from WSCC, WBC and the HA.

Page 103, Paragraph 8.62 – Sustainable Travel.

Specific point to add:
At end of paragraph, add an additional line to say that all development sites will still require TA’s and will have to demonstrate their impact on the network and how they will mitigate any specific impacts.

Page 103, Paragraph 8.85 – Sustainable Travel.

Specific points to change.
Second sentence, change to read: “The implementation of travel plans at developments, utilising appropriate WSCC car parking methodology, enhancing public transport... (continue as already written).”

Policy 14, Page 104 – Sustainable Travel.

Specific point to add.
Third bullet point – add at end of statement: “...and cyclists.”

Specific point to add.
Penultimate paragraph – “Developments will be required to provide appropriate infrastructure to demonstrate sustainable access and to contribute to all necessary measures to promote access by modes of transport other than the private car.”

● Section C – Implementation.

Section 9 - Page 106 - Implementation.

Specific point to consider:
Paragraph 9.7, line 2 – the words ‘under’ and ‘delivery’ should be joined with a hyphen to say; ‘under-delivery’.

Section 10 - Page 110 – Monitoring.

No comments to make.

● Section D – Appendices.

Appendix 1 – Monitoring Framework and Policy Linkages.

Strategic Objective 1 - Pages 115-116 – Protect the Natural Environment and Address Climate Change.

No comment to make.

Strategic Objective 2 - Pages 116-117 – Revitalise Worthing’s Town Centre and Seafront.

No comment to make.

Strategic Objective 3 - Page 118-119 – Deliver a Sustainable Economy.

No comment to make.

Strategic Objective 4 – Page 119-120 – Meet Worthing’s Housing Needs.

No comment to make.
**Strategic Objective 5 – Page 120-121 – Reduce the Social and Economic Disparities and Improve Quality of Life.**

**Strategic Objective 6 - Page 121-122 – Deliver High Quality Distinctive Places.**

**Specific point to check/verify:**

Appendix – Strategic Objective 6 (“Deliver High Quality Distinctive Places”) - the South East Plan policy BE6 is referred to as is PPG16 (but not PPG15). There is also a reference to the SE Plan heritage policy BE6 in Strategic Objective 1.

**Page 122 - Strategic Objective 7 – Improve Accessibility.**

**Specific point to change:**
Under ‘Key local evidence’, the SOCG needs to be updated to current version (2010).

**Appendix 2 – Strategic Risk Appraisal.**

No comment to make.

**Appendix 3 – Core Strategy Key Stages.**

No comment to make.

**Appendix 4 – Evidence Base.**

**Specific point to change:**
Page 131 – Transport – Statement of Common Ground needs to be updated to current version/year (2010).

**Appendix 5 – Housing Trajectory.**

No comments to make.

**Appendix 6 – Saved Local Plan Policies.**

No comments to make.

**Appendix 7 – Glossary.**

No comments to make.

**Appendix 8 – Proposal Map.**

**Specific point to add:**
Once the Minerals and Waste Core Strategy is adopted, Worthing Borough Council must illustrate safeguarded waste sites and waste site allocations on their adopted Proposals Map.
Draft Infrastructure Delivery Plan (IDP) – April 2010.

● Section A – Introduction and Context.

Section 1, Pages 4-6 – Introduction.

No comments to make.

Section 2, Page 7 – What is Infrastructure?

Specific point to add – paragraph 2.1 – (page 7):
This paragraph needs to reflect that the right levels and type of infrastructure are essential to support the objectives of Climate Change, Health (possibly Safety and Security) targets and Quality of Life targets, which are underpinned by DASTS and supported by the LAA.

Section 3, Pages 8-10 – What is the Policy Approach?

Specific point to change:
Page 9, paragraph 3.7 (Policy 12 – New Infrastructure) - Reference is made to recognising costs of providing infrastructure and that such costs should not prejudice the delivery of schemes which meet the over-arching spatial objectives. This statement does cause concern because on many occasions, the need for specific infrastructure is vital to deliver certain developments. Without appropriate infrastructure (and contributions thereto), development schemes should not proceed.

Section 4, Page 11 – What is Infrastructure Planning?

Specific point needing clarification:
Page 11, paragraph 4.3 – Population growth - it mentions population growth and gives a growth table. The table appears to under-quote WSCC-held population data for the year 2026 by 2800 people. Only the figures for 2001 and 2006 appear to be correct. The figures given for 2026 are 101,900 although WSCC figure is 104,700; the years 2016 and 2021 are also under-estimated.

Section 5, Pages 14-15 – How has the IDP been prepared?

Specific point to add:
Page 14, paragraph 5.2 – First sentence should include West Sussex County Council.

Specific point to add:
Page 14, paragraph 5.3 – Reference to an ‘Infrastructure Plan’ for Worthing also needs to be included.

Specific point to consider adding:
A statement about the Trunk Road and the important role it plays for Worthing.
Section 6, Pages 16-18 – Summary of work done to date.

No comments to make.

● Section B – Position Statements.

Section 7, Page 20 – Context.

No comments to make.

Section 8, Pages 21-29 – Transport.

Transport Element – Strategic Road Network

General point to consider:
Under ‘Main Sources of Information’, suggest that documents/references be put in order of hierarchy.

Specific comments to add:
Page 21, ‘Main Sources of Information’ – Need to include reference to ‘Rights of Way Improvement Plan’ (ROWIP) and ‘WSCC Infrastructure Schedule’.

Page 21, ‘Existing Provision’ - The A24 is only “Strategic” and hence only part of the Govt PRN (Primary Route Network) north of Offington Roundabout.

Page 21, ‘Key Issues’ – The first paragraph is not accurate. West Sussex County Council (WSCC) has responsibility for the provision and maintenance of most of the town’s local transport infrastructure. The Highways Agency (HA) is responsible for the A27 Trunk Road. The Trunk Road includes the section of road between Offington Roundabout and Grove Lodge Roundabout. Otherwise, wording in this paragraph is acceptable.

Page 21, ‘Key Issues’ - In the case of Grove Lodge measures must be taken to reduce traffic pollution and hence congestion and therefore means to reduce predicted future increases must be taken because this is now a declared AQMA. This makes the predicted traffic increases mentioned even more significant. Failure to achieve improvements by 2015 will incur EU and government fines on national and probably local authorities.

Page 22, ‘Summary/Role of LDF and IDP, paragraph 3 – There are no scheduled works (or plans for) for major A24 improvements within Worthing or north of Worthing (other than cyclepath/way going in at present). Recommend deleting wording in third paragraph; “…which will include potential new road construction schemes on or around the primary road network…” Continue with wording such as; “including changing travel behaviours…”(continue sentence).

Transport Element – Local Road Network

Specific comments to add:
Page 22, ‘Main Sources of Information’ – Need to include reference to ‘Rights of Way Improvement Plan’ (ROWIP) and ‘Infrastructure Plan’.

Page 23, ‘Planned Provision’, second bullet point – Wording to be amended to say: “Traffic calming measures will be introduced where specified in WSCC Infrastructure Schedule and/or approved Works Programme.”

Page 23, ‘Planned Provision’, final bullet point – Wording to be amended to say: “Some infrastructure work may take place...”

Page 23, ‘Key Issues’, final paragraph - Says WSCC receives Govt funding – needs to be put in context. No funding is received for major schemes, and only a small amount for Works Programme/LTP measures. The majority of the funding goes towards maintenance.

Page 23, ‘Key Issues’, final paragraph – Last sentence is unnecessary and should be removed.

**Transport Element – Rail Services**

**Specific comment to consider:**
Page 24, Main Sources of Information – You may wish to consider adding the Sussex Route Utilisation Strategy (January 2010) to the list.

**Specific comment to add:**
Page 25, Summary/role of LDF and IDP – Final paragraph to be amended to say: “There is an ongoing issue with delays at the railway crossings in the Borough. All surface-level railway crossings in the County are the subject of an ongoing review to see if changes to or closures of certain crossings can be achieved in an attempt to improve rail services whilst maintaining safety and reducing congestion on the road network. However, any changes could have major implications such as delays on certain parts of the network, large-scale re-routing and would need to be modelled very carefully and further in-depth study work would be required to establish viability of any scheme/proposal. Also if crossings closed for car traffic alternative measures would have to be implemented for pedestrians & cyclists. Impact on local shops and services (including emergency access) would also need to be carefully considered and overall appropriate mitigation put in place.”

**Transport Element – Bus Services**

**Specific points to change:**
Page 25, Lead Organisation(s) – Stagecoach Bus Company is currently known as ‘Stagecoach South’. Also, Compass Bus Company is currently known as ‘Compass Travel’.

Page 25, Existing Provision – Second paragraph; Real Time Traffic Information (RTTI) should be; Real Time Passenger Information (RTPI).

Page 25, Existing Provision – Stagecoach Bus Company currently known as ‘Stagecoach South’.

Page 25, Existing Provision – Final paragraph; new low flooring buses should be; new low-floor buses.
Page 25, Existing Provision – Final line of first paragraph – Change to read: “Compass Travel provides services on a contracted basis where services are not commercially viable.”

Page 25, Existing Provision – Second paragraph should read: “A programme of investment to provide Real Time Passenger Information (RTPI) at selected bus stops and inside the hospital has been completed.”

Page 25, Existing Provision – Third paragraph should read: “New routes such as the Pulse have been established and others, such as the 700 have seen service frequencies increased to 10 minute…..” (continue as originally written).

Page 25, Existing Provision – Final paragraph should read: “New low-florr accessible buses...” (continue as originally written).

Page 25, Planned Provision, first paragraph – Coastal Expressway is now known as “Coastal Transport System”. In addition, wording to be changed to say: “CTS is currently being developed as part of a joint project between Brighton and Hove City Council and West Sussex County Council.”

Page 25, Planned Provision, second paragraph – Paragraph is not necessary given content of first paragraph – therefore, delete.

Page 25, Planned Provision, third paragraph – SEMS is now known as “SMS”. Sentence should also be changed to say: “A system to show real time information via SMS text messaging and internet enabled phones is being implemented in conjunction with Travelwise.”

Page 25, ‘Planned Provision’, final paragraph: In the longer term the QBP, as part of ongoing improvements to public transport infrastructure in the Worthing area, may look into the feasibility of bus priority measures within Worthing”.

Specific points to add:
Page 26, Key Issues, third paragraph – 3-in-1 card scheme has placed further financial pressure on the County Council since it’s introduction.

Page 26, Key Issues, first paragraph – (last line) insert the word “increased” between the words ‘and’ and ‘passenger’.

Page 26, Key Issues, second paragraph – 1985 should read 1986. The word ‘buses’ at start of second line should say ‘bus’. On third line, delete the words ‘deemed to be’.

Page 26, Key Issues, third paragraph – Delete sentence starting with; “The reduction in County Council....” – replace with; “This is subject to internal budgetry pressures.”

Page 26, Key Issues, fourth paragraph – Change paragraph to read; “The changes to the English National Concessionary Travel Scheme has placed pressure on the bus companies in terms of extra bus patronage and issues of capacity and the resultant increase in boarding times. There has also been additional financial pressures placed on the Borough Council with respect to funding the increase ini patronage that the scheme has generated.”

Specific point to change:
Page 26, Summary/role of LDF and IDP - second paragraph – Wording should be changed to say: “New development should contribute towards provision of new and/or improved public transport services and infrastructure, where appropriate”.

Specific point to change:
Page 26, Summary/role of LDF and IDP – fourth paragraph – Wording should be changed to say; “The Quality Bus Partnership (QBP) will also continue to work towards higher passenger numbers by providing better infrastructure and working across Council departments as well as with the bus companies.”

**Transport Element – Community Transport**

Specific point to change:
Page 27, ‘Summary/role of LDF and IDP’ – final paragraph – Change wording to read: “To ensure that community transport services continue to operate efficiently and well they need good equipment, especially modern and well-adapted buses. However, although the provision of new buses is a key requirement to maintain service levels, running the scheme itself is even more important. Community Transport is an integral part of passenger transport provision but there are issues of co-ordination - Worthing included. WSCC is working with the sector alongside the West Sussex Compact Agreement along with WBC to seek greater co-ordination through a network of providers who need to provide sustainable services.”

**Transport Element – Walking and Cycling**

Specific point to include:
Page 27, Main sources of information - WSCC Cycling and Walking Strategy.

Specific point to change:
Page 27, Planned provision – The current capital programme includes a limited number of future schemes which are also identified in the LTP.

Specific point to change:
Page 28, Summary/role of LDF and IDP - second paragraph – Travel plans will be sought for developments in accordance with DfT guidelines.

Specific point to add:
Page 28, Key Issues - Add reference to need for cycle parking to be provided.

Specific point to add:
Page 28, Key Issues - Although WBC is not the PROW authority there is much to be gained from integrating the approach to linear networks within the town, with the wider PROW network which connects to beyond the Borough boundary. Recommend that PROW integration with GI together with the on-road cycle network is added to delivery plan. (Inclusion of this in the GI SDP is worth noting.)

**Transport Element – Parking**

Specific point to add:
Page 29, Funding Sources - Add in “developers” to those listed.

Specific point to consider:
Page 29, Summary/role of LDF and IDP - final paragraph – The wording is confusing. WASTM makes reference to car parking strategy although at this stage
it is unknown whether this will lead to some/further infrastructure provision on the local road network. Specifically, the WASTM work points to there being the need to develop an off-street car parking strategy which when combined with other measures such as on-street car parking and park and ride, could then become an overall parking strategy for the Borough.

**Section 9, Pages 30-31 – Housing.**

No comments to make.

**Section 10, Pages 32-38 – Education.**

**Specific points to change:**

Page 32, Lead Organisations - amend to say; “West Sussex County Council, private and voluntary sectors.”

Page 32, Main Sources of Information – Add: WSCC Childcare Sufficiency Assessment.

Page 32, Existing Provision - amend second sentence to read:

There are six children and family centres located in Worthing (Durrington, Findon, The Wave (Broadwater), Footprints (Crescent Road and Lyndhurst Road sites), Worthing (Parkfield Road) and Maybridge (The Strand). These centres are managed by West Sussex County Council, Children and Young People's services (Early Childhood Service ), except Worthing (Parkfield Road) which is a commissioned service run by Spurgeons, a voluntary organisation. All centres are run on 'not for profit' basis.

Page 32, Key Issues - add to end of first paragraph:

The need for addition full day care places (particularly 0-2s) and out of school provision has been identified for the Durrington and Northbrook areas.

second paragraph:

Children and family centres aim to achieve better outcomes for children, (primarily under 5s), families and communities. This is an integrated approach to improve access to information, advice and support through health and other family support services, particularly for those in greatest need. Diversity of provision and parental choice are important.

Page 33 – SOP – the SOP has not yet been published for consultation.

Page 33, Key Issues – first paragraph to read:

“In Worthing there is a key aspiration to deliver the ‘Age of Transfer’ (AOT) changes that have happened in other areas of the County. AOT reorganisation is desirable because the two-tier system of education (primary and secondary schools) reduces the number of schools transfers which is known to adversely affect pupil progress. The AOT reorganisation would require significant funding. It could require a new secondary school. A bid was previously made to 'Building Schools for the Future' to deliver this plan but was not successful. If alternative sources of funding could be secured then the programme for delivery could be earlier.”

Page 35, Planned Provision – second paragraph:

Insert the words “Voluntary Aided School” between the words ‘this’ and ‘by’ at the start of the penultimate line.
Section 11, Pages 39-40 – Health.

Specific comments to add:
Page 39 - Transport implications of proposals. Reference should be made to Air Quality Action Plans and their role to reduce exposure of residents to air pollution (a separate section from NHS & related buildings). Also under health the benefits of reducing traffic pollution for residents and health transport options, walking & cycling.

Section 12, Pages 41-45 – Social Infrastructure.

Specific point to change:
Page 43, Key Issues - Social and Community Services, Youth Development, Key Issues - Final sentence needs to read: "A key element is ensuring that the right services are delivered...”

Section 13, Pages 46-50 – Green Infrastructure.

General comment:
The Green infrastructure (GI) component appears weakly implemented and chapter 13 fails to adequately acknowledge the need for functional ecological corridors as an integral part of GI (e.g. under ‘Planned Provision’). The general need for biodiversity to be incorporated into GI has been acknowledged in Ch13 but this has not been translated into key parts of the document such as the Implementation Plan and Identified Development Sites.

The proposed GI SPD is welcomed, however a notable omission in the IDP is any kind of commitment or strategy to establish new and to enhance existing green corridors through the town/borough perhaps as part of planning obligations pertaining to new development occurring within the town.

Natural England GI Guidance:
‘Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland.’

Specific points to be considered when preparing final version of IDP:

Questions
How can the listed ‘Identified Develop Sites’ contribute to GI biodiversity.
How can the listed ‘Green Infrastructure / Leisure Sites’ contribute to biodiversity targets.
How can GI be retrofitted into the existing urban landscape through T&C Planning?

Specific point to add:
Strategy to establish new and to enhance existing green corridors through the town/borough perhaps as part of planning obligations pertaining to new development occurring within the town.

Further specific points to add:
(Pages 47-50)

Main sources of information:
To include reference to:
Natural England Green Infrastructure Guidance NE176  
PPS12  
PPS9

**Planned Provision:**

*Specific points to add:*
Suitable areas of parks and playing fields to be re-sown with species rich grassland.
Street tree replacement to be of native species.
Nest boxes on public buildings and mature park trees.
Landscape planting around existing and new build to be of native species.
Less trampled beaches to have parts sown with Coastal vegetated shingle species.
Discussions with WSCC Highways for road verges to be sown with species rich grassland.
Artificial reptile hibernacula to be created in allotments.

**Key Issues:**

*Specific points to add:*
Green corridors, PROW and street trees are the green lungs of city life. It is important that the GI SDP makes full reference to these elements. The open space assessment (as ppg17) does not provide this data.

The GI strategy could also consider areas within the town where GI may be retrofitted & where this is strategically beneficial. For example, street tree planting, rain gardens, derelict plots and green walls and roofs.

Need to add something on tranquillity, Quiet Spaces and National Noise Strategy (ambient noise – not in buildings etc.). WBC is now required to designate such spaces and manage noise impacts on them. (Along with WSCC on highway noise).

**Section 14, Pages 51-59 – Public Services.**

*Specific point to change:*
Page 51, 'Existing Provision’, second paragraph – It quotes WSCC calculations are based on an average of 32m2 per 1000 population. This needs correcting to 30m2 per 1000 population.

*Specific points to change:*
Library Service – (page 51):

**Existing provision:**

The statement on the existing provision is, at the time of writing, correct as is the formula for calculating additional provision. However, the other statement concerning the mobile provision and the need for a built library for populations over 4,000 should be modified in the light of the library re-design work. The whole mobile library service is currently under review and, at present, the outcome is not known. Also, for populations up to about 4,000 WSCC would not be looking to build a standalone library but to be part of a community facility.

**Planned provision:**
There is an agreement regarding land in West Durrington for a library. The county council, by agreement, secured library provision as part of new community facilities. Broadly speaking, the new library framework has been agreed and broad aims are known. The savings figure of £502k is not correct and is now just over £1 million. Any savings made in this year can be re-invested in the service but will be removed from the base budget in 11/12.

**Funding sources:**

The Big Lottery money is no longer available. It is not known what the ‘growth area’ or ‘growth point funding’ refers to.

**Key issues:**

Re the Archives for the 21st Century, the "standard charge approach " document is still current. A policy statement from the DCMS (Department for Culture, Media and Sport) in 2010 called " The Modernisation Review of Public Libraries " should be added to the text. This outlines a core offer for libraries in terms of physical provision and services. In particular it stresses the need to tailor services to local needs and to ensure facilities are available for ages, at times when they are needed.

**Specific points to add:**

Waste Management - (page 57):

**Existing provision:**

Second paragraph – Should be re-worded to say: “WSCC – Household Waste Recycling Site (HWRS), to receive waste and recyclables direct from the public, located in the south-east of the borough off Dominion Way operated by Virador (to be closed in 2010).”

Third paragraph – Should be re-worded to say: “WSCC – There is no waste transfer station (WTS) in Worthing. Nearest is in Lancing (Adur District) and is located off Chartwell Road. This is used by Adur & Worthing Council Services to receive waste and recyclables collected by those councils.”

**Planned provision:**

This needs to be updated so re-word to say: “West Sussex County Council – Replacement Household Waste Recycling Site in the south east of the Borough off Willowbrook Road operated by Viridor (opening is planned for Autumn 2010).”

**Key Issues:**

Replace entire ‘Key Issues’ section with this wording: “The catchment of the Worthing Household Waste Recycling Site extends into neighbouring districts (Adur, Arun and Horsham Districts) so further residential development in those districts, in addition to further development in Worthing Borough, has a cumulative effect on waste infrastructure.”

At this time, a need for additional HWRS provision, as outlined above, is anticipated requiring developer contributions. The housing development currently forecast suggests that this additional infrastructure would not be required before 2015.
Concerning transfer station infrastructure, that is something that needs to be monitored.

**Summary/role of the LDF and IDP:**

Replace entire ‘Summary/role’ section with – “The Waste Disposal Authority (West Sussex County Council) is required to make arrangements for the disposal of waste collected by the Waste Collection Authority (Worthing Borough Council) and provide places where the public can take their own household waste for disposal”.

A need for additional waste infrastructure at the existing and/or other location(s) to serve future development has been identified with developer contributions being secured through the LDF and IDP.

**Specific points to add:**

Minerals and Waste Policy – Pages 58-59:

**Existing Provision:**

Change the wording of the last sentence to read: “WSCC Minerals and Waste Policy is responsible for making provision for future mineral extraction and waste management and disposal activities”.

**Planned Provision:**

Clarify that the capacity shortfall specified is for the whole of West Sussex, not just for Worthing and that the figures are correct as at December 2009.

**Recycling and Composting**

Make reference to the overall shortfall in C&I (0.28mtpa at 2026) and C&D (0.17mtpa at 2026) capacity.

**Treatment**

The amount of C&I waste treatment capacity required will be between 0.8mtpa – 0.12mtpa depending on the recycling rates achieved.

The amount of inert waste treatment capacity required will be between 0.2mtpa and 0.27mtpa depending on the recycling rates achieved.

**Funding Sources:**

Include waste operators.

**Key Issues:**

Decoy Farm has been identified as a potential strategic waste site in the emerging Minerals and Waste Development Framework, subject to further assessment.

**Section 15, Pages 60-63 – Utility Services.**

Delivering high speed broadband should be a priority. It links to a number of transport policies at at reducing the need to travel.

**Section 16, Pages 64-65 – Flood Defences.**
No comments to make.

**Section 17, Page 67 – Context.**

No comments to make.

**Section 18, Pages 68-86 – Identified Development Sites.**

Specific point to change for all Core Strategy Policy areas (includes Sections 17-24 inclusive):
The term ‘Lead Agencies’ is a misleading term as the sites would be taken forward/promoted by private developers and not the local planning or highway authorities. The heading should more realistically reflect what certain parties involvement would be with any project/s. Examples might be “Interested and/or involved parties” or “stakeholder”.

Specific points to consider for all Core Strategy Policy areas (includes Sections 17-24 inclusive):
Remove reference to WSCC in ‘Costs and sources of funding’ columns.
All Core Strategy Area commentaries should highlight that developer funding will be required to fund appropriate infrastructure required as a result of the development. The risk of reduced Borough and County funding is highlighted as low. The risk is actually high. Impact of risk on low cost schemes may be lower that for high cost proposals.

**West Durrington Strategic Location – Core Strategy Policy 1.**

Section C - (page 69). In the section headed Community Facilities it seems to imply that there would be two No. library facilities, one as part of the Tesco site and one "on site" community facility. WSCC would not anticipate providing two libraries so if there were two community centres we would identify the most appropriate. If the two centres served significantly different purposes then WSCC would work with the community to agree the most appropriate provision.

P70 Costs and Services – funding should include requirement for the developer to deliver or fund the Highway improvements listed.

**Aquarena – Core Strategy Area of Change 1.**

Specific point to add:
Page 72, Leisure – new swimming pool complex – Under ‘Summary/Outcome’, reference to car parking and access by sustainable modes to be added in this column.

**Marine Parade: Stagecoach Site – Core Strategy Area of Change 2.**

No comments to add.

**Grafton Site – Core Strategy Area of Change 3.**

No comments to make.

**Union Place South – Core Strategy Area of Change 4.**
No comments to make.

**Teville Gate – Core Strategy Area of Change 5.**

**Specific points to change:**
Under ‘Summary/Outcome’ against ‘Comprehensive package of transport measures’ – expand the explanation of the possible highway infrastructure works – make reference to Chapel Road J/W Teville Road and Chapel Road J/W Newlands Road + other specific junctions such as Railway Approach, Hertford and Stanhope Road. The Teville Road foot crossing already exists but may need to be changed/moved in accordance with any specific junction design.

**Specific point to add:**
Although not currently an AQMA, this could be with the addition of proposed further development, therefore requiring measures to improve air quality (potentially a wide range of measures similar to that needed at Grove lodge but tailored to the local problem) and mean that both existing and new residents will have to live in an AQMA. Impact on policy SO7.

**Newland Street Superstore Site – Core Strategy Area of Change 6.**

**Specific point to add:**
SEE COMMENTS ABOUT AQMA FOR TEVILLE GATE, ABOVE.

**British Gas Site: Lyndhurst Road – Core Strategy Area of Change 7.**

No comments to make.

**Land Adjacent to Martletts Way – Core Strategy Area of Change 8.**

No comments to make.

**The Warren, Hill Barn Lane – Core Strategy Area of Change 9.**

**Specific point to add:**
P82: The Warren: Hill Barn Lane - This site will have a direct impact on the Grove Lodge AQMA. Add this to ‘Transport & highway issues’. It will also affect a further likely AQMA at Downlands Parade, further east on the A27. Impact on policy 19 and SO7.

**Specific point to add:**
In ‘Employment’ column, add reference to possible consideration of educational/leisure uses.

**The Strand – Core Strategy Area of Change 10.**

No comments to make.

**Northbrook College, Durrington and Broadwater Sites – Core Strategy Area of Change 11.**

**Specific point to add:**
A “Highways and Transport” box is needed to reiterate that said in the Core Strategy under ‘Area of Change’.

Decoy Farm – Core Strategy Area of Change 12.

Specific points to change:
Page 86, ‘Summary and Outcome’ (against ‘Transport and Highways’) – further clarification of description of possible highway works – may need to change ‘road’ into ‘roads’. In addition, remove reference to WSCC from ‘Costs and sources of funding’. Also, the figure of £500,000 needs to be explained – where did it come from and what does it relate to?

Section 19 – Transport.

Specific comment to consider:
Package options are not described in full and more detail may assist here – perhaps to further explain the context of the work done as part of WASTM and ‘Do-Minimum’. Cost estimates to be removed as they may not be accurate.

Strategic Road Network – High, Medium and Low cost package options.

Specific comment to add for each:
Strategic Road Network: Air Quality Action Plan elements need to be implemented as part of any works (or indeed softer measures in tandem with works). NO2 emissions need to be reduced to below current levels in Grove Lodge area and care to avoid tipping other sections of the surrounding network over the Govt NO2 objective. Again, remove cost estimates.

Local Road Network.

Specific points to change:
Pages 89 & 90 - Remove reference to A2032/A24 junction improvements as these were only put forward as possible option for testing using WASTM – NOT a committed scheme. Also remove all funding figures and reference/s to ‘Blue Book’. Could add that costs are ‘under review’.

Rail Services.

Specific point to include:
Rail crossing closures scenarios modelled only basically as part of WASTM project. All surface-level railway crossings in the County are the subject of an ongoing review to see if changes to or closures of certain crossings can be achieved in an attempt to improve rail services whilst maintaining safety and reducing congestion on the road network. However, any changes could have major implications such as delays on certain parts of the network, large-scale re-routing and would need to be modelled very carefully. Also if crossings closed for car traffic alternative measures would have to be implemented for pedestrians & cyclists. Impact on local shops and services (including emergency access) would also need to be carefully considered and overall appropriate mitigation put in place.”

Specific point to change:
Reference to crossing closures be left general – remove specific references to actual locations and remove costs.
Bus Services.

Specific points to change:
Page 92 – costs estimated at £200k. The West Durrington report on P70 indicates that costs are likely to exceed £200k.

Page 92, ‘Capital works to speed up bus services’ (Costs and sources of funding) – Remove cost estimate and replace with wording to say: “costs under review”.

Page 93, ‘Summary/Outcome’ column – Coastal Transport System is what should be quoted here. Remove reference to Coastal Expressway bus service.

Page 93, ‘Summary/Outcome’ column – Real Time Traffic Information and SEMS should be changed to ‘Real Time Passenger Information’ (RTPI) and ‘SMS’, respectively.

Page 93, ‘Summary/Outcome’ column – Add:

- Deliver a high quality, high frequency, bus-based public transport service
- Build on success of existing services along the West Sussex coast and in Brighton & Hove
- Deliver passenger information/branding
- Promote integration with rail services and development particularly at Shoreham Harbour

Page 93, ‘Status’ column – Add:

“A Major Scheme Business Case is being developed to bid for a significant funding contribution from the Government’s Regional Transport Fund. It is anticipated that this will be submitted at the end of 2010.

The WSCC Transport Plan emphasises the commitment to this transport strategy.”

Page 93, ‘Lead Agencies’ – WSCC, BHCC & ADC. Remove reference to Stagecoach as they are not a current partner.

Page 93, ‘Costs’ – Change to say: TBC – these are currently being assessed through the preparation of the Major Scheme Business Case. (Remove reference to £1m).

Community Transport.

No comments to add.

Walking and Cycling.

No comments to add.

Car Parking.

Specific comment to include:
Page 95, Risks – Include comment to say that neither land nor funding has been identified and/or secured.
Section 20 – Housing.

No comments to make.

Section 21 – Education.

Specific changes to make:
Page 98, ‘Summary/Outcome’ column – Add further wording to say: “The reduction in the number of school transfers that pupils have to undergo can help progress and outcomes.”

Page 98, ‘Status’ – Delete entire paragraph that says: “The next opportunity...2012/2013”. Replace with: “The future of BSF Programme is uncertain and will be subject to review by the new government”.

Page 98, ‘Lead Agencies’ – Add DfE (who may be a ‘Lead Agency’).

Page 98, ‘Costs and Sources of Funding’ – Re-write to say: “AOT would require significant funding to form a new primary and secondary schools.

Page 98, ‘Risks’ – Delete paragraph and replace with: “Insufficient school sites of sufficient size to meet the preferred pattern of school organisation, together with insufficient funds to deliver the associated demands.”

Section 22 – Health.

No comments to make.

Section 23 – Green Infrastructure/Leisure.

Specific point to check:
Is ‘Big Lottery Funding’ still available?

Section 24 – Flood Defences.

No comments to make.