

ISSUE 10: TRANSPORT AND INFRASTRUCTURE (POLICIES 29 AND 30)

10.1 Are all the requirements of policy 29 (Transport and Connectivity) reasonable, justified and deliverable?

10.1.1 Yes, it is considered that the requirements of Policy 29 are reasonable, justified and deliverable. Policy 29 seeks to secure significant improvements to transport and mobility in Adur. The policy requirements are designed to address transport issues affecting Adur (see para 4.70 of the Submission Adur Local Plan (CD07/1) which themselves reflect the West Sussex Local Transport Plan 2011-2026 (CD12/6) and to deliver V8, V10, V11 and objectives O2, O9 and O10 of the Submission Adur Local Plan.

10.1.2 As well as improvements to the road network and infrastructure, matters such as the location of development, air pollution, cycle, pedestrian and bridleway facilities (rights of way network) are addressed. The policy sets out need for travel plans, transport assessments and air quality assessments (which is also sought through the strategic site policies in Part 2 of the Local Plan). Parking is also addressed, with reference to West Sussex County Council (WSSCC) guidance. (WSSCC is the highway authority for the Adur area).

Justified:

10.1.3 A range of work has been carried out which supports and justifies the requirements of Policy 29.

10.1.4 The Adur Local Plan and Shoreham Harbour Transport Study - Second Addendum Revised Reissue (CD12/3) is the most up to date transport evidence base supporting the Adur Local Plan and the Shoreham Harbour Joint Area Action Plan. (Several iterations of this work have been undertaken to support the Local Plan through its development - see CD 12/1-3). It considers the transport impacts of strategic residential and commercial site allocations within Adur and Brighton and Hove in 2031; revised access arrangements for the West Sompting site; collision and safety hotspot identification and mitigation; and highway improvements at key junctions. This evidence indicates that proposals and the level of development within the Adur Local Plan can be achieved satisfactorily with the mitigation measures proposed across the plan area, and other planned changes (such as the Highways England improvement scheme for the A27).

10.1.5 The transport evidence base has been based on the use of the Shoreham Harbour / CTS transport model. The model has a base year of 2008, and work has been ongoing throughout plan preparation to explore and test alternative spatial strategy options. It is acknowledged that the base date of the model is now older than is desirable. For this reason West Sussex County Council has provided guidance on interpretation of the

model's outputs and assurance that the forecasts are robust (CD12/8). The observed traffic growth between 2008 and 2015 has been compared with the model's forecast and it is considered that the trends agreed. In fact, the forecast model predicted higher growth in most cases than that which was actually observed and then extrapolated to the forecast year. The exception was considered as attributable to the forecast flows being restrained by the capacity of the A27/A2025 Lancing Manor roundabout. These results give some assurance that the forecasts are robust.

- 10.1.6 In addition, the Shoreham Town Centre Study (2014) (CD12/5) was commissioned by WSCC to address congestion issues in Shoreham along the A259 and including junctions with the A283. The objectives of the study were to improve the town centre for vehicular movement and circulation efficiency, enhance pedestrian access and manage air quality; and to mitigate the impacts of proposed development levels from Shoreham Harbour Western Arm on Shoreham town centre.
- 10.1.7 It is worth noting that work continues to take place on traffic analysis and management. For example, WSCC is now leading on formally commissioning WSP-Parsons Brinckerhoff to undertake the Shoreham Area Sustainable Transport Package Study. Stage 1 of the study has recently commenced and will involve an options appraisal and feasibility study to identify a package of feasible transport improvements in and around Shoreham which can be delivered to support development around the area.
- 10.1.8 In addition, West Sussex County Council, has produced a Transport Strategy for the Shoreham Harbour Regeneration Area (CD13/15). The aim of the Transport Strategy is to support the JAAP by identifying a programme of transport infrastructure improvements, services and travel behaviour initiatives; to minimise the impact of the new development on the existing transport network and communities, while connecting the Harbour with its surroundings. It is underpinned by a comprehensive technical evidence base, including an implementation programme so that the package of improvements is proportionate and can support the delivery of the planned regeneration to 2031. The strategy has been agreed by the Shoreham Harbour Leaders Board, which includes representatives of Adur and West Sussex Councils, as well as Brighton & Hove City Council.

Deliverability: How will Policy 29 be delivered?

- 10.1.9 The policy provides a framework for assessing transport mitigations required in association with development. Developer contributions will be sought via s106 undertakings and s278 agreements as appropriate (and potentially via the Community Infrastructure Levy in due course). WSCC as the highway authority is consulted on relevant proposals, at application stage (and also pre-application on developer request). With regards to strategic sites, as indicated above, a range of mitigations, including those to junctions on the A27 have been identified through the study work

(more detail can be found in responses to questions 4 and 5). These requirements have been derived from, and justified by, the Adur Local Plan and Shoreham Harbour Transport Study - Second Addendum Revised Reissue (CD12/3). It is important to note that the costs have been derived in proportion to the predicted impact of each development on each respective junction.

- 10.1.10 The strategic sites also offer opportunities to address sustainable transport measures, including improvements to public transport, provision of pedestrian, cycle and bridleways, and a package of travel behaviours initiatives are sought. These are intended to encourage and facilitate travel by alternatives to the car, further reduce impact on the road network, as well as encourage and facilitate access into the South Downs National Park (SDNP) (particularly given the close proximity of the New Monks Farm, West Sompting and Airport allocations to the SDNP).
- 10.1.11 Viability is of course an important component of deliverability. The Adur Whole Plan Viability (WPV) study (CD24/11) has considered Policy 29. The study states that the implementation of area-wide behaviour change programmes will have costs. The study also considers specific costs for the strategic sites in Strategic Site appraisals - please see other responses for more details).
- 10.1.12 The funding sources and cost apportionment of transport infrastructure can be seen in Section C - Implementation Plan of the Infrastructure Delivery Plan (CD07-19). Some improvements are anticipated to be implemented by the developers or through developer contributions, while other improvements to the local network will be funded through WSCC Capital Programmes, its Major Schemes Programme or other funding sources. (See also "The A27" below regarding funding arrangements for improvements to this trunk road).
- 10.1.13 Bus services / access arrangements for buses will need to be considered in relation to strategic sites being allocated in the Local Plan. The Local Plan currently identifies this need generally; the New Monks Farm and West Sompting sites will require improved public transport provision as noted in Policies 5 and 6 respectively.
- 10.1.14 The Local Plan will have a limited role in influencing the running of the strategic rail network. However, Section C of the Adur Infrastructure Delivery Plan (CD07/19) identifies that the Western Harbour Arm should improve access to stations.

The A27

- 10.1.15 Highways England manages the trunk road network which within Adur is the A27 and its slip roads at Shoreham. The A27 is the main road transport route running east – west on the Sussex Coast.

- 10.1.16 The Government has announced the Worthing to Lancing improvement scheme estimated to cost in the range of £50 million to £100 million which aims to improve the capacity of the road and junctions along the stretch of single carriageway in Worthing and the narrow dual carriageway in Lancing. The extent and scale of the improvements are to be agreed in consultation with West Sussex County Council and the public, via a full consultation, in accordance with the Roads Investment Strategy. After the A27 Corridor Feasibility Study, the scheme was included in the March 2015 Roads Investment Strategy (RIS, published by the Department of Transport in December 2014). The Highways England Delivery Plan 2015-2020 outlines the next steps for taking the scheme forward.
- 10.1.17 The Local Growth Fund awarded £13.78m for the Shoreham Area Transport Package (which includes Shoreham Airport). Further investment is also committed by the Local Enterprise Partnership to support Highways England to improve the capacity, reliability and resilience of the roads recognising the problems of congestion on the A27 Worthing and Lancing corridor.

Development of Policy 29:

- 10.1.18 The policy has evolved with the Local Plan. In response to a representation from WSCC regarding the Proposed Submission Adur Local Plan 2014 a reference has been added to paragraph 4.74 to make clear that new pedestrian and cycle networks should integrate with existing routes as far as possible.
- 10.1.19 Amendments were also made to paragraph 4.78 to clarify guidance on parking standards, in response to a representation from the Home Builders Federation (Representation 32, received regarding the Proposed Submission Adur Local Plan 2014). The Council considers that the amendments now ensure that the Submission Adur Local Plan complies with Planning Policy Guidance with regard to parking standards (paras 153 and 154).
- 10.1.20 A reference to the WSCC parking standards has also been inserted into the policy itself, in order to reflect the Ministerial Statement of March 2015 regarding the use of local standards.
- 10.1.21 Support for the policy has also been expressed by Brighton & Hove City Council, in a representation to the Proposed Submission Adur Local Plan 2014 (CD04/4) which stated:

'The policy approach on Transport and Connectivity in the Adur Local Plan provides strong links to priorities in Brighton & Hove City Plan in relation to transport policy. This is particularly welcome in relation to a coastal sustainable transport system, effective cycle networks and reducing the need to travel.'

10.1.22 In conclusion the Council considers that the requirements of Policy 29 are reasonable, justified by the evidence base, and deliverable.

10.2 Are all the requirements of policy 30 (Delivering Infrastructure) reasonable and justified?

10.2.1 Policy 30 seeks to deliver V1, V11, and O4. As stated in paragraph 4.87 of the Submission Adur Local Plan (CD07/01) it addresses the mechanisms by which infrastructure will be secured.

10.2.2 The first paragraph of the policy reflects guidance on planning obligations set out in the Planning Practice Guidance (PPG) (paragraph 001, Planning Obligations Reference ID: 23b-001-20150326) which explains that planning obligations can mitigate the impact of unacceptable development to make it acceptable in planning terms. PPG also makes clear that Local Plans should set out policies for seeking planning obligations (Planning obligations para 003 ref 23b-003-20150326).

10.2.3 The second paragraph makes clear that the Council will work with stakeholders to ensure that the necessary infrastructure is delivered to support development. Although this is a 'procedural statement' it has been included to reflect local concerns as to how the needs of new development can be served, and make explicit the role of the planning system in securing appropriate infrastructure. (The Council's Infrastructure Delivery Plan October 2016 (CD 07/19) sets out the infrastructure required to deliver the Local Plan).

10.2.4 The third paragraph relates to the need for infrastructure to be provided at the appropriate time, and to the role of phasing of development to ensure this. It is considered that this is consistent with national guidance, and makes clear how the Council will facilitate this through the planning process.

10.2.5 Paragraph four relates specifically to the use of planning obligations and/or Community Infrastructure Levy (CIL). At the time of writing, CIL is not being progressed for Adur due to resource issues; however, the Adur LDS 2016-18 (CD07-20) states that work will commence in early 2017. As a result, and given the time period covered by the Adur Local Plan, the policy is written to address both 'without CIL' and 'with CIL' situations.

10.2.6 In both scenarios, planning obligations will only be sought where they meet the tests set out in paragraph 204 of the National Planning Policy Framework (NPPF) (CD01/1) and the Community Infrastructure Levy Regulations 2010: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

- 10.2.7 The PPG also sets out an explanation as to how planning obligations relate to other contributions (Paragraph: 002 Reference ID: 23b-002-20140306). As CIL is progressed by Adur, this will be reflected in the emerging CIL Charging Schedule, and accompanying planning obligations guidance which will be prepared in parallel (Guidance on Infrastructure Provision SPD – please see Adur LDS CD07/20). This will clarify the relationship between planning obligations and CIL.
- 10.2.8 The final paragraph, relating to the delivery of utility infrastructure, was added to the policy in response to a recommendation made by Southern Water in response to the Draft Adur Local Plan 2012 Regulation 18 consultation, which sought a separate policy relating to the delivery of service infrastructure. Although the point was accepted, it was considered most appropriate to address this matter within the existing policy.
- 10.2.9 It is noted that a representation made by the Home Builders Federation (HBF) in 2014 (insert reference number) states that the policy is unsound because it is ineffective and unjustified. It states:

The Council will need to explain how the underlying assumption in its Viability Assessment that developments will contribute just £1,000 per dwelling by way of S106 squares with the requirement of the policy 30 that S106 arrangements will need to be continued after the adoption of the CIL in order to secure site specific infrastructure delivery. The Council will need to demonstrate how contributions amounting to just £1,000 per dwelling will support the requirements of its Infrastructure Plan:

The HBF refers to the Adur Whole Plan Viability and CIL Study 2014 (Please note an updated version is now available CD 24/11). As well as undertaking a 'whole plan viability' assessment of the policies in the Adur Local Plan, the study assesses requirements for notional developments and strategic sites, and considers whether the viability of these developments allows opportunities for CIL. (It should be noted that further viability work relating to CIL will be undertaken when CIL is progressed further). Other than certain defined areas within the Shoreham Harbour Regeneration Area, and New Monks Farm strategic allocation, the Study has determined that certain types of development in the Adur Local Plan area are viable for CIL.

- 10.2.10 If/when CIL is adopted by Adur, certain site-specific planning obligations may still be required (for example to ensure appropriate access to a site). However it is not assumed that all planning obligations currently sought will continue to be sought alongside CIL. Work will be undertaken to ensure no 'double dipping' will arise – as referred to above, the Council will prepare an SPD entitled 'Guidance on Infrastructure Provision' alongside the emerging CIL Schedule (see Adur LDS 07/20) to clarify requirements. Given this, the wording of the fourth paragraph is considered appropriate. However, it is not considered necessary to justify the use of CIL in detail

at this stage – this will be evidenced, consulted on, and examined, through the CIL process itself in due course.

- 10.2.11 It is also noted that Sussex Wildlife Trust (rep ID 25 2016) seeks specific reference to green infrastructure within the policy. As the policy addresses the ‘mechanisms’ by which contributions may be collected, rather than types of infrastructure that may be provided, this is not considered necessary.
- 10.2.12 West Sussex County Council’s representation made in response to the Amendments to the Proposed Submission Adur Local Plan (2016) (rep 2016 63/23) refers to references to planning obligations, section 106 agreements and planning conditions in the policies of the Local Plan. It states that strategic site policies should refer to use of section 278 agreements to secure developer contributions (particularly with regard to the delivery of a new roundabout on the A27). This has not been considered necessary as the use of s278 agreements is established by the Highways Act 1980; however, if it is considered that such an addition is necessary to make the Plan sound, it is proposed that a reference could be included within this policy.