



WORTHING LOCAL PLAN 2020- 2036

WBC-E-09

Matter 7 – Transport & Accessibility

October 2021

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Matter 7 – Transport and Accessibility

Issue 1: Is the WLP’s approach to transport and accessibility justified, prepared, effective and consistent with national policy?

Policy DM15

Q149. Is the policy effective, justified and consistent with national policy in respect of transport and access in new developments?

Council’s Response:

The transport policy has been tested through the Worthing Transport Study, ([CD/L/1](#)), its appendices and the addendum report for the A27 corridor ([CD/L/2](#)), in accordance with Government guidance on Transport Evidence Bases in Plan Making and Decision Taking. The policy incorporates the key principles of the NPPF in providing for transport access to be met through sustainable means and aligning growth with infrastructure in a proportional manner in compliance with the NPPF’s presumption in favour of sustainable development.

Options for growth in and around Worthing are extremely limited and all development sites are located within, or adjacent to, the built up area boundary. As a consequence, all sites have reasonable or very good accessibility. Despite this, the Local Plan seeks to minimise the impact of new development on the transport network through encouraging and requiring improvements to support sustainable modes of transport.

The Council considers that Policy DM15 is supported by robust evidence and is effective, justified and consistent with National Policy in respect of transport and access in new developments. More specifically:

In conformity with the NPPF (paragraphs 104,105,106) transport issues were considered from the earliest stages of preparation and have been considered throughout the process. The Local Plan Transport Study ([CD/L/1](#)) and Addendum ([CD/L/2](#)) has reviewed all allocations to assess the transport impacts forecast (capacity and congestion) from each development. The study then sets out ways in which any potential impacts can be mitigated and where junction improvements are required. This work is linked to the overarching objective to support improvements for sustainable transport modes which are established in the Plan and also within supporting documents such as: the WSCC Sustainable Transport Investment Programme and the Adur & Worthing Local Cycling & Walking Infrastructure Plan ([CD/L/8](#)) and Infrastructure Delivery Plan ([CD/F/10](#)).

With reference to NPPF paragraph 106 criterion e), there are no opportunities for strategic large scale growth in and around Worthing. However, the Local Plan Transport Study identifies improvements required at key junctions to support growth. The A27 running east-west through the north of Worthing is over-capacity and increases journey times significantly through (and within) the borough – as such, the Council will continue to support Highways England (now ‘National Highways’) as they develop improvement plans for this stretch of the strategic highway network.

With reference to NPPF paragraph 106 criterion d) the Local Plan includes the following

policies:

- Policy DM5 (Quality of the Built Environment) a) vi) sets out that all new development should include a layout and design which: take account of potential users of the site; create safe conditions for access, egress and active travel (walking and cycling) between all locations.
- Policy SP3 (Healthy Communities) a) ii) Protect and enhance safe and accessible active travel routes and Non-Motorised User routes to enable exercise and physical activity as part of everyday life.
- Policy DM15 (Sustainable Transport & Active Travel). Supporting text paragraphs 5.217-5.222 & 5.224 set out further information on walking and cycling networks, Local Cycling and Walking Infrastructure Plans as well as cycle parking. Criterion a) sets out: Worthing Borough Council will promote and support development that prioritises active travel by walking, cycling, Non-Motorised User routes and public transport, and reduces the proportion of journeys made by car. This criterion is underpinned by a number of policy requirements.

In conformity with NPPF paragraph 106 criterion b) the WLP and related evidence was prepared with the active involvement of West Sussex County Council (the local highway authority) and Highways England (now 'National Highways'). This has culminated in the preparation and signing of a Statement of Common Ground (CD/H/24) which summarises the basis on which the three parties have actively and positively worked together to meet the requirements of the NPPF and the Duty to Co-operate. It sets out areas of agreement and, importantly, also highlights the agreed actions that will allow parties to plan for improvements (particularly to help support sustainable modes of transport) which are necessary to address future traffic growth impacts associated with the WLP.

Q150. In its response to my initial letter, the Council acknowledge that criterion a. iv) is not sound in relation to parking standards and the reference to West Sussex County Councils' guidance. On this basis, is suggested modification M32(a) necessary to ensure soundness?

Council's Response:

As explained within the Council's response to the Inspector's initial questions ([WBC-E-02 Response to IL01](#)) (p.15-86) it is agreed that it would be misleading for the Local Plan policy to indicate that proposals must accord with the West Sussex County Council Standards / Guidance. It is also accepted that specific Local Plan policy requirements should not defer matters to other documents. To address this, the Council has proposed modification M32(a) which helps to clarify how the County guidance will be applied at the local level and what other considerations will inform the appropriate level of provision. This amendment is necessary for soundness as it will help to ensure that the policy is effective and deliverable.

Q151. What is the justification for suggested modification M32(b) and is it necessary to make the plan sound?

Council's Response:

The Council is of the view that this modification is necessary for soundness.

As explained within [WBC-E-02 Response to IL01](#) (p.1-14) the new criterion b) vii) at the end of Policy DM15 highlights and links the revised NPPF and the recently published national guidance, including the National Design Guide and the National Model Design Code. This change will ensure that the policy is consistent with national guidance.

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