



Public Document Pack

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Committee Manager Andrew Bishop (Ext. 37984)

25 July 2022

PLANNING POLICY COMMITTEE

A meeting of the Planning Policy Committee will be held in the **Council Chamber, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF** on **Wednesday 27 July 2022 at 6.00 pm** and you are requested to attend.

Members: Councillors Bower (Chair), Hughes (Vice-Chair), Chapman, Coster, Edwards, Elkins, Goodheart, Jones, Lury, Thurston and Yeates

PLEASE NOTE: Where public meetings are being held at the Arun Civic Centre, to best manage safe space available, members of the public are encouraged to watch the meeting online via the Council's Committee pages.

1. Where a member of the public wishes to attend the meeting or has registered a request to take part in Public Question Time, they will be invited to submit the question in advance of the meeting to be read out by an Officer, but of course can attend the meeting in person.
2. We request members of the public do not attend any face to face meeting if they have Covid-19 symptoms.

Any members of the public wishing to address the Committee meeting during Public Question Time, will need to email Committees@arun.gov.uk by 5.15 pm on Tuesday 19 July 2022 in line with current Committee Meeting Procedure Rules.

It will be at the Chief Executive's/Chair's discretion if any questions received after this deadline are considered.

For further information on the items to be discussed, please contact Committees@arun.gov.uk

A G E N D A

6. RESPONSE TO SOUTHERN WATER'S DRAINAGE AND WASTEWATER MANAGEMENT PLAN CONSULTATION (Pages 1 - 12)

The proposed response to the consultation.

10. TRANSPORT FOR THE SOUTH EAST STRATEGIC INVESTMENT PLAN CONSULTATION (Pages 13 - 21)

The proposed response to the consultation.

Note: If Members have any detailed questions, they are reminded that they need to inform the Chair and relevant Director in advance of the meeting.

Note: Filming, Photography and Recording at Council Meetings – The District Council supports the principles of openness and transparency in its decision making and permits filming, recording and the taking of photographs at its meetings that are open to the public. This meeting may therefore be recorded, filmed or broadcast by video or audio, by third parties. Arrangements for these activities should operate in accordance with guidelines agreed by the Council and as available via the following link [PART 8 - CP - Section 5 Filming Photographic Protocol](#)



DWMP Team
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Yeomans Road
Worthing
BN13 3NX

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Maltravers Road
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West Sussex. BN17 5LF

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web: www.arun.gov.uk
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28 July 2022
Please ask for: Kevin Owen (Team Leader)
Planning Policy & Conservation
Directorate of Place
Direct Line: (01903) 737853

Dear DWMP Team

RE: Drainage and Wastewater Management Plan (DWMP) consultation between 13 June and 5 September 2022:
Arun District Council response

Thank you for providing Arun District Council the opportunity to comment on the documents forming the proposed Drainage and Wastewater Management Plan (DWMP) consultation.

This letter makes high level comments with respect to the above consultation, broadly based around the order of topics and consultation questions that are on your web site (<https://southernwater.co.uk/dwmp>), rather than necessarily, providing a detailed response to every question.

Planning for the future

The main points considered to be important currently, and going forward, from the Council's perspective, within the catchments falling into Arun District are set out below.

As an overarching point, it is considered that, the key priorities in the Arun Waste Water catchments, are addressing groundwater and surface water infiltration, associated with the high groundwater level and Arun's location on the coastal plain; in addition, maintaining and improving the chemical, biological and ecological statuses of the protected water bodies and nature designation sites in Arun District.

Addressing the issues identified above, will also be critical to reducing the occurrence and frequency of discharges from storm overflows from the network, so that existing and future designated bathing waters retain or improve to excellent standard.

Finally, and not least, is that progress on any of the above is not compromised through the accommodation of future growth within and cumulatively, adjacent to Arun. Indeed – Southern Water must align its capital forward planning for investment in the WWTW network in a transparent way with respect to the phased accommodation of housing growth set out in

existing and emerging development plans; including allowances for cross boundary and windfall and background growth. Although the overall growth levels are set out in terms of each Waste Water catchment, the note containing this does not set out the exact housing figures this has been based on. For the purposes of transparency, this information must be included. This should be on the basis that the DWMP sets out a specific section on an 'enabling role' supporting development plan deliverability (and infrastructure viability) including though subsequent Statements of Common Ground. Currently, there are still barriers to this alignment, evidenced by significant time and resource expended by Southern Water and adjacent Local Authorities on resolving forecasting methodologies and confirmed timescales for investment.

The roles and responsibilities for water, protection of the environment and improving the management of drainage and wastewater infrastructure, cover a wide number of organisations, from the national, regional or local level down to individual landowners. It will therefore, be essential for Southern Water to collaborate with all stakeholders. Some suggestions for coordination of responsibilities are included in the following sections of this letter.

Creating Resilient Wastewater Systems

In terms of future investment priorities, it is felt that these should be directed in the following order of priority:

1. Focusing on the outcomes of the Storm Overflow Force Taskforce, to ensure no reoccurrence of the discharges to bathing waters - as occurred during 2021 along the coast of Arun District
2. Detailed investigation of appropriate separation solutions and exact design (i.e. size and scale) of new storage tanks to be delivered within the towns of Bognor Regis and Littlehampton;
3. Prioritisation of investigating the practicalities of locating storage tanks in the Lidsey catchment to attenuate flows and reduce spill events
4. Reviews of permits for all treatment works within Arun District, especially the Summer Lane, Pagham works to ensure no detrimental impacts on the water environment of Pagham Harbour
5. Joint education programme and/or implementation of grant schemes directed at businesses in Arun around improvement of FOG (the industry acronym for Fat or Grease) management and installation of grease traps
6. Consideration of the scope to increase the design capacity of any further extensions or provision of replacement pipes, as needed to increase the network's overall ability to accommodate growth

Options and Development

The overall principle set out in this section is around separation of rainwater from the foul sewerage systems, where possible, to reduce sewer flooding and storm overflows and is roundly endorsed and supported. The issue of the frequency of storm overflow discharges particularly, has been brought up in repeated correspondence from this Council to Southern Water since December 2021. In answer to the previous question of priorities, it can be seen that this remains a top priority for this Council. Furthermore, a number of the other priorities listed above are also linked to this issue. The Council would especially wish to direct Southern Water to priorities 2 and 3 listed above, which are connected to providing the confidence that the solutions to be delivered to address these issues, will be robust into the future. This needs to take into account the characteristics of the district, such as the high groundwater level resulting from its location on the coastal plain, and the known issues connected to groundwater penetration into the waste water network that occurs.

The majority of Littlehampton and Bognor Regis are served by combined sewers, many of which have the majority of surface water flows coming from highway drainage. Experience of the Council, when it was involved with separating a small section of Littlehampton's network, was of it being complex and only dealing with a very small part of the system. Although it is appreciated that looking at a wider catchment level can help, this Council do not consider that it is appropriate for this approach to always be prioritised over traditional hard engineering solutions. The Council considers that the exact local characteristics and circumstances need to be factored in at the design level, particularly when dealing with predominantly existing built-up areas such as the Ford catchment.

It would however, be suggested that a wider catchment approach may be appropriate, along with actions such as Permit Reviews, for new large scale proposals for example, within the Lidsey catchment and opportunities for integration of the Rife into the BEW development (because there will be less of the combined outflows and more space for delivery). The most appropriate collaboration that could be done in conjunction, would be providing specific technical input with both developers and case officers over site or catchment level actions to be taken, as a scheme/proposal progresses through the planning system. The Council would be glad for a pilot to be done focused on this approach. The pilot could then be used as a case study for others, either in a similar location on the coastal plain or where groundwater and surface water ingress is especially acute.

With respect to groundwater ingress/penetration, The Council would urge Southern Water to consider the cost/benefits of preventative action e.g. via a financial inducement /recompense scheme for landowners, including local authorities, to introduce infrastructure that reduces rainwater runoff into combined sewers. This would not only encourage of delivery of such measures but also potentially reduce cost of future corrective action so that it could be covered by savings (i.e. invest to save).

It has been identified that blockages can be one of the main reasons contributing to internal sewer flooding and the main actions to address this, being at source, best achieved through changing customer behaviour. It is suggested that Southern Water, in collaboration with the local authority (Arun) do a specific education programme targeted at food businesses generally within Arun district and/or consider grants for delivering improvements in FOG management e.g. through installation of grease traps etc. for existing businesses.

Investment Needs

Though it is agreed that Southern Water should prioritise those options that provide multiple benefits, this should not be at the expense of ensuring that solutions are sufficiently resilient to last into the future long-term.

The Council is glad to see that many of the projects for the 3 catchments (Ford, Lidsey, Pagham) within its boundaries, are scheduled for the short-term period of 2025-2030, but would also wish Southern Water to consider and set out within the DWMP, those areas for collaboration and the further actions suggested in the previous section of this letter. Further, Arun would suggest that the comments made above in relation to collaboration, means that the DWMP should be referred to in terms of partnership working and be given the same weight as other documents such as the Water Resource Management Plan. Specifically, the DWMP document needs to make it clear where the linkages are with intended actions triggered by planned growth in Arun, being addressed in these other plans (i.e. water recycling/treatment works extension at Ford; as set out in the Statement of Common Ground between Arun District Council and Southern Water in 2017).

The DWMP sets out the 3 DEFRA scenarios of; protecting the environment; protecting public health in designated bathing waters; and ensuring storm overflows operate only in unusually heavy rainfall events. Arun are glad to see this specific inclusion in the document and would wish this to be continued in the final DWMP. As an authority however, rather than disagree with any of the options as the questions ask, the Council would strongly agree that all of these aims are required.

Taking the above into account, it is important to address the frequency and incidence of discharges from storm overflows and in particular, the higher number of combined sewer overflows arising in the urban areas, impacting the number of existing and any future bathing waters. In his regard, the Council would prefer that Southern Water propose planning for and addressing all of the scenarios. It is recognised that there is still high uncertainty over the cost figures included within the DWMP on this topic, including with respect to associated impact on household bills. However, the following approach should be taken into account:

- Due to the number of chalk stream in its district, spillages should be minimised, taking account of the cost range in sensitive areas (chalk streams));
- That the 10 per year average may have to be moderated in order to reduce increases to household bills;
- That where storm overflows are recognised as the cause of reduced GES, that Southern Water take responsibility and through the DWMP, tackles this issue while ensuring that the impact to household bills is curtailed at the lower cost on the basis that the chief responsibility rests with Southern Water.

In summary, the Council welcomes that catchment wide options are being considered but would not wish this to be at the expense of traditionally engineered solutions, when taking local characteristics/circumstances into account at the detailed design stage. Arun Council's priority remains connected to the need to reduce the incidence and frequency of spillages from storm overflows. It has tried to provide some suggested areas of collaboration within this letter and to reflect its local knowledge and experience on key issues that could help improve the situation

or delivery of the DWMP objectives.

This letter responds to the current DWMP consultation – however, in October and November 2021 the Council also set out key considerations as part of its early response. This is included as an appendix to this letter.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Owen', written in a cursive style.

Kevin Owen (Team Leader Planning Policy & Conservation)

Arun District Council

CC:-

Neil Crowther (Group Head of Planning), Arun District Council;

Appendix 1: Letter 26 October setting out Arun early Comments on DWMP Process



Tel: 01903737853

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e-mail: kevin.owen@arun.gov.uk

26 October 2021

Please ask for: Kevin Owen

Your Ref: "[Your Ref]"

Our Ref: DWMP Autumn 2021

Dear DWMP Team

RE: DWMP Consultation

Thank you for the opportunity to respond to the consultation on the Drainage and Wastewater Management Plan (DWMP). It is understood that this is intended to be the longer term strategic plan covering drainage, wastewater and environmental water quality and the comments that are provided in this letter are given in this vein. I also understand that a formal consultation will take place next year (June 2022).

Officers from the Council's planning policy and engineering teams attended workshops on 28 and 30th September and the 19th October, related to the 3 specific drainage catchments or systems within the District. It is hoped that the input made at these is captured along with this informal response letter in the further development of these plans (this letter is a provisional response subject to confirmation after 30 November). The letter addresses the issues in order of the consultation questions subject matter.

It is appreciated that the 14 planning objectives used are based on those set by Water UK, which were then supplemented i.e. Nutrient Neutrality, and it is appreciated that all 3 works within Arun District have been identified through the screening and BRAVA exercises to require improvements. However, the Council does have some concerns over the reasons behind these, as set out in this letter.

Problem characterisations

The most obvious point on this aspect is how little the existing issues are dealt with i.e. flooding and discharges at outfalls, including lack of urgency/clarity on when these are scheduled to be dealt with. The approach merely identifies the standards that have been set

and consequently, the standard that will be applied. This does not explain the reasons or assumptions behind these to give any confidence that the specific issues will be resolved. An obvious example has been the recent discharges at the outfalls, from the Consented Storm Water Overflows in the Littlehampton area and why these were so significant. It is not obvious from the content of the existing workshop documents whether this is temporary and will not continue in the future because there is a lack of capacity/resilience in the system. Repeated internal flooding of basements at properties along South Terrace, Littlehampton occurs but does not seem to have been picked up. With the increase in volume caused by the torrential rain there was a) surcharging manholes (lifting cover(s) of in the road) and b) backing up inside property (flowing out of WCs & shower trays. The issue of impact on bathing water both at Bognor Regis and at Littlehampton is a current issue which was acknowledged in the workshops. The solutions or remedies are difficult because of the range of factors which impact – however, Arun District Council would urge that specific solutions be found in the short and intermediate term.

Groundwater flooding is a significant issue for Arun District not fully explained by its topography, with only 3 small areas of the District not affected by this. Attention should therefore, be given to the relative variance of susceptibility of flooding from this source. For example, this variance is specifically known to be high across a large proportion of the area and significantly impacts the Lidsey area. The information relating to this can be seen within the Arun SFRA Update 2016 Appendix F¹. Due to this characteristic, it is not fully understood why planning objectives 4 and 7 (in the short term) have not been classed as very significant for all the systems within Arun District. The Lidsey system in particular has had long standing historical problems not just any that may be anticipated in the future. This is particularly relevant when inundation is so prominent in Arun resulting from the impact of the run-off from the chalk spring line (e.g. South Downs) onto the impermeable clay around Lidsey, Barnham, Elmer and other villages. More detailed discussion on the exact issues for this area can be found in the Lidsey SWMP and the associated ones around Elmer can be found in the Elmer SWMP.

Although not a currently a direct issue for any of the systems within Arun, officers are acutely aware of the emergent issues around nutrients and water neutrality that neighbours are facing. While it is encouraging that nutrient neutrality has been recognised and added to the planning objectives, Southern Water are reminded that there are designated sites (e.g. Arun Valley SPA), which partially overlap with the Arun District area which are hydrologically and cumulatively linked to the planning authority area. The Council is therefore, deeply concerned at being the only sub-regional area not to have the ability to demand the required water neutrality standards through planning decisions through default, purely based on the boundaries of the relevant catchment. Arun District Council would therefore, urge that a comprehensive coordinated and cumulative approach be applied to this topic in Arun going forward with policy solutions and recommendations.

Option Development and Appraisal

As was raised within the workshops, there is a need to ensure that the modelling and forecasting reflect the latest EA sea level projection, peak river flow and rainfall intensities at the relevant catchment and medium ranges, unless otherwise advised by the Agency.

The Council would wish to see a consistent and coordinated methodology applied across all systems and catchments to the establishment of development headroom within connected

¹ <https://www.arun.gov.uk/flood-risk-planning-policy>

planning authority areas. This should clarify the impacts on and of Dry Water Flow calculations, using a comprehensive database of existing, planned and unplanned developments to establish headroom for discharge consents. It must be emphasised that this must go across local authority boundaries to fully account for the cumulative impacts of development. This is particularly important when focusing on Pagham Harbour where the authority boundaries cut through the middle of it and includes associated issues such as the location of water quality testing or access. To this extent, Arun officers would like to meet with you to discuss setting up a liaison meeting to refresh and update the previous Statement of Common Ground (2017)² – as Southern Water have similarly been coordinating with Chichester District Council and the Environment Agency.

Linked to this, the Council wish for more guidance to be produced (e.g. to ensure robust construction of foul drainage connections where the groundwater is high) and strongly enforced to prevent future infiltration, which is a significant issue for a large proportion of Arun District as discussed above. Additional to this, tide locking and high water levels will mean that certain solutions (e.g. extra storage via SUDs) may not always be appropriate in their present form or standard requiring other solutions or standards to be identified and proposed.

For overall development of options, it is recommended that to address some of the problem characteristics, consideration be given including the role of recommissioning redundant plant/equipment and infrastructure for pumping, treatment or storm storage and short to intermediate term remedies. It seems that there are assets that could potentially be reused in an active way to help towards some solutions.

It is suggested that a full assessment of the risks posed by climate change be taken into account, especially looking at the role and location of existing assets related to sustainable growth and whether larger scale consolidation/augmentation or relocation maybe needed for any assets. This may be especially pertinent to the Manhood peninsula and/or coastal locations once the impact of climate change coastal flooding and any erosion is accounted for.

In particular, it is evident in Arun that a combination of ground water flooding susceptibility and tidal water tables limit the current scope of SUDs to attenuate flooding and surface /ground water infiltration in their current form. The council urges a more holistic and strategic approach be investigated including objectives that decarbonise the WwTW infrastructure in terms of renewable energy and in particular the scope for pumped water storage on a inter-catchment basis looking at the South Downs National Park and coastal plain including river Arun. Manmade water bodies, uphill in the Downs must be feasible option provided that sensitive landscape considerations are accommodated given the urgency of the climate emergency.

Similarly, the Council would wish to see that there is consideration of the scope for larger scale – i.e. catchment or landscape scale – nature based solutions, that may be appropriate for any specific locations in Arun or the connected catchments. If found appropriate through further stages and refinement, then a mechanism for coordinated engagement with all relevant stakeholders (e.g. local authorities and developers or land promoters) should be prioritised and reflected in the investment programme in order to align other documents or plans.

² <https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n15993.pdf&ver=16505>

Investment Programme

It is appreciated that there is not going to be one simple solution required but a combination throughout each, however the Council consider all of the objectives of the DWMP should be considered as a priority for investment within Arun District, as is detailed through the above points in addition to the existing designation of 'Improve' for each of the systems (Ford, Lidsey and Pagham) falling in the district.

As signalled under comments on the Option Development and Appraisal section above, the Council would wish more work to be done on responses to proposals for connection to the systems, along with guidance and specifically enforcement of high standards for design details to ensure robust construction of foul drainage in areas with high groundwater to prevent future infiltration. This can be achieved in short term through direction towards existing information that is available from West Sussex County Council (WSSC) and the Districts and Boroughs. This could then be addressed more comprehensively through the creation of stand-alone or coordinated documents with WSSC or respective authorities that can be used in determining applications as material considerations until entrained in Supplementary Planning Documents following plan making and testing at examination.

The issue of the high groundwater level and associated high susceptibility to groundwater flooding will be essential during the detailed work on solutions for those systems in Arun District. There should be clear direction provided over the appropriate roles and actions to be taken by each party.

Finally, a clear set of comprehensive documents need to be issued on wider strategic issues that affect the whole region, such as that of nutrient neutrality, particularly nitrates although phosphates and others also apply. The Council do not wish to be left as the only area not being able to apply high standards when all it's neighbours are being required to apply such. This would also be counter to the Council's overall priorities to address the climate emergency declared in January 2020 and the intention to raise standards of new developments wherever possible.

Overall in summary, Arun District feel that:

- there needs to be greater content on the existing issues and how and when these are to be dealt with;
- consistency in the methodology used (climate change allowances and DWF calculations);
- significantly greater enforcement of high design details for the robust construction of foul drainage in areas of high groundwater;
- possible recommissioning of redundant assets;
- identify where natural solutions would be expected to occur and engage with all needed in their development; and
- believe there should be investment in the production of standalone or coordinated guidance documents.

I would be grateful if you could contact me at kevin.owen@Arun.gov.uk or phone 07908919397 in order to coordinate possible meeting dates (for the purposes set out and underlined above under 'Option Development and Appraisal') week beginning 8 November.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Owen', written in a cursive style.

Kevin Owen (Team Leader Planning Policy & Conservation)

Appendix 2: Planning Policy Committee Item 8 Drainage and Wastewater Management Plan (DWMP) Consultation - further points email 15 December 2021

From: Kevin Owen

Sent: 15 December 2021 17:52

To:

Cc:

Subject: FW: Planning Policy Committee Item 8 Drainage and Wastewater Management Plan (DWMP) Consultation - further points

Dear Sally,

Apologies for the delay in forwarding this updated response.

Further to the interim letter response on 26 October, below are Arun member's additional points made at the meeting of Planning Policy Committee (PPC) on 30 November 2021. I have grouped these under the appropriate letter topic headings :-

Problems and Characteristics

- Southern Water needs to set out via the DWMP how the company can be interventionist and proactive on combatting the impact of blockages in the sewer network and consequent storm related back surges within properties (e.g. in the Pagham and Yapton catchment areas). E.g. consider appropriate penalties/charges to deter inappropriate flushing of wet-wipe and fatty waste products as well as a public information/guidance and campaigns; including Southern Water's operational response to such incidences.

Option development and appraisal

- Southern Water to clarify in the DWMP action to address East of Arun catchments surface run of capacity – e.g. impact of development within Arun and Worthing e.g. on Ferring rife incidence of storm water discharges
- Southern Water to consider and clarify their role in the DWMP for assisting with nature based water storage (e.g. SUDs, wetlands etc.) solutions – including in terms of design policy standards, operation and offsetting infrastructure planning to serve developments and collaborating with other stakeholders and agencies in delivering 'nature based' water storage solutions e.g. wetland habitats which deliver both biodiversity net gains and carbon sequestration
- Opportunities for water storage needs to be balanced with the need to remove water from the land quickly out to sea because of the high coverage of surface water flood risk across Arun
- In the scoping the feasibility of recommissioning of redundant/disused assets (e.g. for pumping, treatment or storm water storage) to attenuate current and emergent problems - due care be given to ensure that this does not lead to inadvertent issues e.g. resumption of pumped outfalls to sea at Pagham etc. This includes assessing measures to address carbon reduction and renewable energy solutions e.g. pumper water storage etc.

Investment Programme

- Southern Water's supporting evidence for the DWMP identifies Ford WwTW bottom of the list for capacity/performance and therefore, needs priority investment urgently (given its strategic significance for facilitating planned growth in the adopted Arun local Plan).
- Arun is a key tourist destination with a dependent visitor economy reliant on clean bathing beaches – consequently, there needs to be urgent action to prevent the incidence of licensed and unlicensed combined storm/foul waste water discharge to the sea at outfalls affecting Arun's key bathing facilities with climate change likely to increase storm rainfall

The meeting agreed that comments should only relate clarifying the above points actually raised at the meeting - I would therefore, be grateful for any editing clarifications by Friday 3 December please.

I hope that these are helpful and aid clarification of the provisional response letter.

K rgs

Kevin

Arun District Council Proposed Response: Transport for the South East (TfSE) – Strategic Investment Plan Consultation Survey

SECTION 1: Background information

1. In what capacity are you completing this survey?

<input type="checkbox"/>	Resident
<input checked="" type="checkbox"/>	On behalf of a group, organisation or government body
<input type="checkbox"/>	Business owner or operator
<input type="checkbox"/>	Visitor to the region
<input type="checkbox"/>	Member of Parliament
<input type="checkbox"/>	Other (please specify)

2. How much do you know about TfSE?

	Active Involvement	Good knowledge	Some knowledge	Limited knowledge	No knowledge
My knowledge of Transport for the South East is:	My knowledge of Transport for the South East is: Active Involvement <input type="radio"/>	My knowledge of Transport for the South East is: Good knowledge <input checked="" type="radio"/>	My knowledge of Transport for the South East is: Some knowledge <input type="radio"/>	My knowledge of Transport for the South East is: Limited knowledge <input type="radio"/>	My knowledge of Transport for the South East is: No knowledge <input type="radio"/>

3. Have you reviewed the relevant SIP documentation?

<input checked="" type="checkbox"/>	Yes - I've read the SIP
<input type="checkbox"/>	Yes - I've read the SIP summary
<input type="checkbox"/>	No
<input type="checkbox"/>	I'm not sure

Section 2: Investment Priorities

This section of the survey relates to the Investment Priorities of the SIP (p23 - 25), click [here](#) to view.

Investment Priorities

The Packages detailed in this Plan address eight investment priorities aligned with the vision and strategic goals of the TfSE Transport Strategy and the wider regional, national, and international policy context with which both are aligned.

Decarbonisation & Environment - Accelerate decarbonisation of the South East, enabling the UK to achieve net zero by 2050 or sooner, and delivering a transport network better able to protect and enhance our natural, built, and historic environments.

Adapting to a New Normal - Enable the South East's economy and transport systems to adapt sustainably to changing travel patterns and new ways of working and living in a post pandemic and Brexit world.

Levelling up Left Behind Communities - Deliver a more affordable and accessible transport network for the South East that promotes social inclusion, improves health and wellbeing, and reduces barriers to employment, learning, social, leisure, physical and cultural activity for all communities.

Regeneration and Growth - Attract investment to grow our economy, better compete in the global marketplace, and unlock regeneration and growth opportunities where this has been held back by inadequate infrastructure or poor integration between land use and transport planning.

World Class Urban Transit Systems - Deliver world class and seamlessly integrated, sustainable urban transport systems (rail, bus, tram, ferry, cycling, and walking) for the South East's largest conurbations, to enable residents, businesses, and visitors to travel easily and sustainably within and between built up areas.

East - West Connectivity - Enhance our east – west corridors to same level as radial links to and from London to boost connectivity between our major economic hubs, international gateways (ports, airports, and rail terminals) and their markets.

Resilient Radial Corridors - Deliver an increasingly reliable transport network that is smarter at managing transport demand, and more resilient to incidents, extreme weather, and the impacts of a changing climate.

Global Gateways and Freight - Enhance the capacity and contribution of the freight and logistics sector to the South East's economy through improved connectivity to Global Gateways and adapt to changing patterns of freight demand and trade.

4. Which of the above investment priorities do you feel are important for the SIP to deliver? (Tick all that apply)

Decarbonisation & Environment	✓
Adapting to a New Normal	✓
Levelling Up Left Behind Communities	✓
Regeneration and Growth	✓
World Class Urban Transit System	✓
East – West Connectivity	✓
Resilient Radial Corridors	✓
Global Gateways and Freight	

5. Do you have any further comments on the SIP’s investment priorities? Please limit your response to 250 words.

Support the identified priorities which are logical and relevant to the Arun District. In particular:-

- Improving public transport systems and connectivity for sustainable travel through the region, and Arun district
- Carbon neutrality and reduce emissions throughout the transport systems is attained as soon as possible (like many other authorities, Arun District Council has declared a climate change emergency).
- Prioritise sustainable modes of transport (e.g. eVehicles) while also ensuring congestion and demand is managed, to achieve the benefits of pollution reduction, environmental amenity, including opportunities for health and wellbeing (e.g. through active travel).
- Invest to make transport networks more inclusive (affordable and accessible)
- Support regeneration and growth, which is important for Arun District through linking up existing and proposed regeneration schemes for local residents and businesses through coordinating the SIP with local interventions – however, there should also be a priority for ‘placemaking’ and building new communities through supporting Development Plans.
- Improving east-west connectivity is also important for regeneration but should also include all branch lines.
- A more reliable transport network should ensure that it is resilient to accidents and climate/weather incidents which currently have a significant negative impact on the limited roads networks in the district.

Section 3: Packages of Interventions

This section of the survey relates to the Packages of Interventions section of the SIP (p32 - 73), click [here](#) to view.

6. For the purposes of data gathering and analysis, the TfSE region has been split into four geographies. Which of the following geographic areas are you most interested in? Please be aware that some local authority areas appear in more than one of the geographies and you may need to select more than one of the geographies if this is the case for your specific area of interest. Choose all that apply.

- Solent and Sussex Coast (Hampshire, Southampton, Portsmouth, Littlehampton, Worthing, Brighton, Isle of Wight)
- London – Sussex Coast (Chichester to Eastbourne, Surrey, West Sussex and East Sussex excluding the Hasting Area)

Solent and Sussex Coast:

7. To what extent do you agree that the packages of interventions for the Solent and Sussex Coast area will deliver on the priorities of the SIP?

Definitely agree	
Somewhat agree	✓
Neither agree nor disagree	
Somewhat disagree	
Definitely disagree	
I'm not sure	

8. Please select all of the packages for the Solent & Sussex Coast area that you feel are important in achieving the priorities of the SIP. Tick all that apply.

South Hampshire Rail (Core)	
South Hampshire Rail (Enhanced)	
South Hampshire Mass Transit	
Isle of Wight (two Packages)	
Sussex Coast Rail	✓
Sussex Coast Mass Transit	
Sussex Coast Active Travel	✓
Solent and Sussex Coast Highways	✓

9. Do you have any further comments on the Packages of Interventions for the Solent and Sussex Coast area? Please limit your response to 250 words.

Support the identified Solent and Sussex Coast packages and interventions which are logical and relevant to the Arun District. In particular:-

- Packages of intervention that are located within, or close to the district will help to achieve the SIP priorities such as ‘Regeneration and Growth’ & ‘East-West Connectivity, however, they need to be integrated to address potential conflicts associated with improving infrastructure e.g. new or improved highways potentially generating carbon, pollution emissions and adverse environmental impact (e.g. land take affecting biodiversity, landscape quality).
- The Sussex Coast Rail improvements must also benefit the branch lines of Bognor Regis and Littlehampton (as opposed to just main line stations) to address regeneration and levelling up of disadvantaged communities e.g. support for the potential benefits of an ‘Arundel Chord’ connecting the Arun Valley Railway line with east-west South Coast rail journeys serving Greater London (i.e. the value for money business case should look at the Worthing to Horsham benefits and not just Brighton to Horsham benefits).
- It is also unclear why additional capacity is only to be introduced between Worthing and Brighton given the extensive conurbation of Portsmouth and Southampton which is also strategically important for Arun’s connected towns and villages.
- It is therefore, unfortunate that the Sussex Coast Mass Transit proposal being developed, will focus on East Sussex as opposed to both East and West Sussex.
- Support positive highway schemes in the ‘pipeline’, such as the A27 bypass at Arundel but there needs to be locally supported additional ‘*Place based packages of interventions*’ (see Arun’s proposed response 5th bullet Q5.).
- There is a need to coordinate the improvement options for the A27 at Chichester, Worthing and Arundel to deliver optimum solutions for this stretch of a regionally important road.

London – Sussex Coast:

10. To what extent do you agree that the packages of interventions for the London – Sussex Coast area will deliver on the priorities of the SIP?

Definitely agree	
Somewhat agree	✓
Neither agree nor disagree	
Somewhat disagree	
Definitely disagree	
I’m not sure	

11. Please select all the packages for the London - Sussex Coast area that you feel are important in achieving the priorities of the SIP. Tick all that apply

London - Sussex Coast Rail (2 Packages)	✓
London - Sussex Coast Mass Transit	✓
London - Sussex Coast Active Travel	✓
London - Sussex Coast Highways	

12. Do you have any further comments on the Packages of Interventions for the London - Sussex Coast area? Please limit your response to 250 words.

Support the identified Packages of interventions for the London – Sussex Coast. In particular:-

- The three (ticked) proposals are positive seeking to improve public transport and active travel, to become more attractive to local residents, reducing the number of car trips, carbon and pollutants released. Of particular interest to the council is “L12 A29 Corridor Rural Bus Service Enhancements”.
- The positive reference to “J5 Arun Valley Line - Faster Services” helping to improve connectivity between the coast and the capitol (however, see Arun’s proposed response 2nd bullet Q9).
- However, there is not enough information within the consultation document to fully understand them, and the potential impact upon Arun district. For instance, what is planned for the “M10 West Sussex Inter-Urban Cycleways”.

Global Policy Package of Interventions

The Global Policy Interventions are designed to address the challenges and opportunities that affect the whole of the South East. These include challenges beyond the TfSE boundaries such as climate change and opportunities such as new mobility technologies.

The key Global Policy Interventions would help deliver the investment priorities of the South East are:

Decarbonisation - We aspire to deliver a faster trajectory towards net-zero than current trends are expected to yield or from investment in sustainable transport alone.

Public Transport Fares - We wish to reverse the real terms increase in the cost of public transport compared to motoring.

New Mobility - We see great potential for new mobility (e.g. electric bikes and scooters) to boost active travel in the South East.

Road User Charging - We encourage the UK government to develop a national road user charging system to provide an alternative source of funding to fuel duty and to help manage demand in parallel to integrated local measures.

Virtual Access - The past two decades, amplified by the global Covid pandemic, has shown how virtual working and virtual/remote access to services can help reduce demand for transport services.

Integration - We wish to see improvements in integration across and between all modes of transport in terms of infrastructure, services, ticketing, and accessibility, as well as better integration between transport and land use planning.

13. Which of the above Global Policy Interventions do you feel are important for the SIP to support? (Tick all that apply)

Decarbonisation	✓
Public Transport Fares	✓
New Mobility	✓
Road User Charging	
Virtual Access	✓
Integration	✓

14. Do you have any further comments on the SIP's Global Policy Interventions? Please limit your response to 250 words.

Support the Global policy interventions and in particular:-

- the positive interventions would deliver very significant reductions in carbon emissions.
- However, many are co-dependent needing to be implemented concurrently e.g. increased virtual working may potentially reduce overall demand but road pricing will still play a role to manage demand for private vehicles and resultant congestion, by making lower-carbon transport options more attractive or use of 'new mobility options' and public transport through a substantial reduction in fares.
- Affordability of public transport is a key issue for Arun, especially in our deprived wards. However, it is also not clear if reducing fares of public transport is achievable as is dependent upon national policies and intervention.
- New mobility options must also be supported by managing demand to reduce congestion.
- Improvements in integration across, and between, all modes of transport in terms of infrastructure, services, ticketing, and accessibility is also very important, especially in a district such as Arun, where there are quite remote areas in terms of access to public transport. This is not just the case in the smaller villages, but also some parts of the urban areas. This, along with the cost of public transport are two of the reasons for the high car usage.

Section 4: Benefits and Costs

This section of the survey relates to the Benefits and Costs and the Funding and Financing sections of the SIP (p74-106), click [here](#) and [here](#) to view.

15. Do you think that the SIP captures the benefits and costs of the proposed packages of interventions adequately? Choose any one option.

Yes	✓
No	
I'm not sure	

16. Please explain your answer to the above question here. Please limit your response to 250 words.

Broadly support that the SIP does capture the benefits and costs. However: -

- it is not fully clear if the costs have been assessed taking into account inflation /indexing and contingency looking ahead between SIP publication and the works actually being implemented e.g. – see the rising costs involved with HS2 and other road-based improvements such as the A27.
- It is evident in Arun that at a strategic level, the assessment of COBA (Cost Benefit analysis) and NPV/VFM (Net present Value or Value for money) for strategic transport schemes may be undertaken using different methodologies, depending on the relevant agency e.g. National Highways and the Local Highway Authority i.e. traffic assessments for the A27. This undermines confidence and consistency and may be a role for the TfSE SIP to play in helping to ensure that methodology aligns between agencies and authorities.

17. Do you have any further comments on the funding and finance approach of the SIP? (Please limit your response to 250 words)

The key issues Arun would wish to raise with the SIP are that:-

- The majority of the SIP funding is linked to new road improvements, and the most important schemes are already committed with funding in place.
- The SIP suggests some potential innovative approaches but clearly states that for the time being, reliance is based on current funding methods. The SIP should, therefore, focus on these for at least the first 5 years but keep innovative approaches under review, identifying appropriate action to lobby government to inform the next review of the SIP.
- While the future quantum of government funding allocated to future transport infrastructure (beyond current spending plans) is unknown, given the Climate Change emergency, it is suggested that reliance on historical trends to predict future SIP spending requirements is extremely questionable.

Section 5: Delivery of the SIP

This section of the survey relates to the Delivery section of the SIP (p107 - 123), click [here](#) to view.

18. To what extent do you agree that, as a whole, the packages of interventions will deliver on the priorities of the SIP?

Definitely agree	
Somewhat agree	✓
Neither agree nor disagree	
Somewhat disagree	
Definitely disagree	
I'm not sure	

Only collectively will the packages deliver on the priorities. Success is dependent upon them all being delivered in an integrated way. Failure to deliver some of the packages would mean that some of the priorities might not be delivered.

As it the SIP has made clear, the implementation of the packages is entirely dependent upon other organisations, and central government funding and not TfSE. As a result, there is always the risk for some of the interventions to not be implemented.

Section 6: Integrated Sustainability Appraisal and Conclusion

19. Do you have any comments on the Integrated Sustainability Appraisal?

A number of objectives are to protect and enhance, whereas ISA 3 states “To protect and minimise harm to the historic environment, and to maximise opportunities for enhancement”. It is suggested that it is more effective to state “To “protect/preserve or enhance”.

20. Overall, to what extent do you agree that the SIP makes the best case possible for investing in transport infrastructure in the South East?

Definitely agree	
Somewhat agree	✓
Neither agree nor disagree	
Somewhat disagree	
Definitely disagree	
I'm not sure	

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