



# Public Document Pack

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Committee Manager Andrew Bishop

19 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](mailto: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](mailto:Committees@arun.gov.uk)

## AGENDA

1. APOLOGIES

2. DECLARATIONS OF INTEREST

Members and Officers are invited to make any declaration of pecuniary, personal and/or prejudicial interests that they may have in relation to items on this agenda, and are reminded that they should re-declare their interest before consideration of the items or as soon as the interest becomes apparent.

Members and Officers should make their declaration by stating:

- a) the item they have the interest in
- b) whether it is a pecuniary/personal interest and/or prejudicial interest
- c) the nature of the interest

3. MINUTES

(Pages 1 - 10)

The Committee will be asked to approve as a correct record the Minutes of the Planning Policy Committee held on 7 June 2022.

4. ITEMS NOT ON THE AGENDA THAT THE CHAIR OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

5. PUBLIC QUESTION TIME

To receive questions from the public (for a period of up to 15 minutes).

6. RESPONSE TO SOUTHERN WATER'S DRAINAGE AND WASTEWATER MANAGEMENT PLAN CONSULTATION

(Pages 11 - 18)

Southern Water are consulting on a Drainage and Wastewater Management Plan (DWMP) over the period 13 June to 5 September 2022. This DWMP document has been split into 5 papers, which cover the overall strategy and approach Southern Water intends to take over the next 25 years for the wastewater catchments they serve. Members are asked to consider and agree the proposed consultation response. [The proposed response will be circulated separately ahead of the meeting.]

7. THE PROVISION OF RESOURCES TO ASSIST THE COUNCIL ON MATTERS RELATING TO THE A27 ARUNDEL IMPROVEMENTS (Pages 19 - 22)

The report asks Members to recommend to Policy and Finance Committee for budgetary provision to enable the Council to engage a professional resource in relation to the National Highways A27 Improvement scheme at Arundel.

8. WORK PROGRAMME IMPLICATIONS OF FULL COUNCIL'S DECISION NOT TO RECOMMENCE LOCAL PLAN REVIEW (Pages 23 - 30)

The report sets out for Members which work streams will cease, continue or start as a consequence of the Full Council resolution not to recommence the Local Plan review.

9. ARUN TRANSPORT MODEL UPDATE (Pages 31 - 34)

This report updates Members on the Arun Transport Model Phase 1 work commissioned in 2021 for the purposes of evidencing the Local Plan update (when it resumes) transport impacts and necessary mitigation schemes.

10. TRANSPORT FOR THE SOUTH EAST STRATEGIC INVESTMENT PLAN CONSULTATION (Pages 35 - 42)

Transport for the South East (TfSE) are undertaking a public consultation on a Strategic Investment Plan (SIP) with a vision to 2050. The £45 billion Strategic Investment Plan will provide a framework for delivering sustainable, integrated transport investment, levelling up, housing and economic growth, carbon reduction and adaption to climate change. Members are asked to consider and endorse the proposed consultation response. [The proposed response will be circulated separately ahead of the meeting.]

11. GYPSY & TRAVELLER DEVELOPMENT PLAN DOCUMENT UPDATE (Pages 43 - 48)

This report updates Members on progress to resolve objections from West Sussex County Council in relation to proposed sites for intensification identified in the Regulation 18 consultation Gypsy & Traveller Development Plan Document (G&T DPD) and the next steps needed to deliver a Regulation 19 publication G&T DPD.

**OUTSIDE BODIES - FEEDBACK FROM MEETINGS**

Members will provide verbal updates if there are any.

12. WORK PROGRAMME

(Pages 49 - 50)

The Committee's Work Programme for 2022/23 is attached for Members' information.

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](#)

# Agenda Item 3

Subject to approval at the next Planning Policy Committee meeting

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## PLANNING POLICY COMMITTEE

7 June 2022 at 6.00 pm

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

Councillors Bicknell and Gunner were also in attendance for all or part of the meeting.

### 47. DECLARATIONS OF INTEREST

There were no Declarations of Interest made.

### 48. MINUTES

The Minutes of the previous meeting held on 25 January 2022 were approved by the Committee and signed by the Chair.

### 49. ITEMS NOT ON THE AGENDA THAT THE CHAIR OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

The Chair notified Members that there was to be a new consultation on the A27 looking specifically at the traffic in and around Walberton. This consultation was likely to occur before the Committee's next meeting on 27 July 2022 but at this stage there were no further details available to discuss at this meeting, and the Chair would therefore keep Members informed as to how they could make their comments and receive a response in due course.

### 50. PUBLIC QUESTION TIME

The Chair confirmed that there had been no questions from the public submitted for this meeting.

### 51. START TIMES

It was proposed and seconded that the start time for the remaining meetings of Planning Policy Committee for 2022/23 be 6pm.

The Committee

RESOLVED

That the start time of all remaining meetings of the Committee for 2022/23 would be 6pm.

## 52. ARUN LOCAL PLAN UPDATE - SIX MONTH REVIEW

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which briefed Members on matters arising from national policy and whether a decision should be taken by the Committee to resume the Arun Local Plan update or continue the current pause, previous agreed by Committee and Full Council, until 2023. He explained that a Planning for the Future White Paper (and an emerging Planning Bill) signalled some significant changes to the format and process of preparing Local Plans and the concern with proceeding with the update was due to the timetable involved and the risk the Local Plan Update would not be fit for purpose by the time it was ready. He further explained that, six months on from the decision to pause, much had changed including a new Secretary of State for Levelling Up, Housing and Communities and the Levelling Up White Paper having been published in February 2022 which signalled a move away from the aforementioned planning bill. He highlighted the four key themes of the Levelling Up white paper [on pages 10 and 11 of the Agenda Pack] and the change in emphasis on the role of planning, in that it was now more narrowly focused on making the best of the current system. He concluded that the above suggested to Officers that there was now no reason to delay and that the Local Plan Update should be resumed.

Members (and non-Committee Members invited to speak) then took part in a full debate on the item where a number of points were raised including:

- the understanding from Government that the housing numbers target, and as a consequence the 5-year housing land supply, would be removed and whether in resuming the update the housing numbers target would have to be looked at again when the Council came to exploring the evidence base
- that by this time next year the Local Plan would not be up-to-date unless the revising of it is started within 5 years and the implications for determining planning decisions in this situation, and, therefore given the long lead times involved in the process, the need to resume the Update
- the lack of a timeframe within the recommendation with regards further detail being made public by Government on the Levelling Up bill and the difficulties in reaching a decision without the context of that roadmap
- the impact to housing targets if the Plan was resumed
- the unachievability of housing targets when considering what developers had managed to deliver and the increases in building prices
- the impacts for policies, such as biodiversity net gain and water conversation, and the consequences for future housing developments if the Plan was not updated with the most up-to-date evidence and practices
- the issues caused by 'planning by appeal' in areas outside of those identified for development and whether any assurance could be gained for residents that the Update and its evidence base would offer some level of protection against this
- a review of the local plan not reducing the number of houses already committed to in the current Local Plan, and any Update most likely involving an increase rather than a decrease in that number

- the process of engaging residents within the Update to the Local Plan and the Statement of Community Involvement
- regret that the Update was delayed in part on the conjecture and guesswork of Committee and non-Committee Members rather than established facts
- any Update needing to be based on facts and reality, including around appropriate housing numbers and infrastructure capacity
- that Arun does not have a failing Local Plan, but that the current Local Plan was allowing the Council to be held to ransom by developers who were not building the approvals they already had and instead applied for more planning permissions which they knew would be overturned on appeal if refused by Committee
- the issue of the 5-year land supply and how it was being kept artificially low due to builders not building and whether as the Local Planning Authority there was more that we could be doing to make these happen
- the planning system being weighted towards developers
- concerns about supporting the resumption of the Update if it meant an increase in the housing numbers required
- the imposition of housing numbers by a Government not familiar with the local area
- whether the Local Plan had to be reviewed anyway as it had not been able to identify a 5-year housing land supply
- the need for the housing stock to be able to respond to the challenges of climate change now
- energy and food security issues, and the need for land use to be optimised
- whether energy saving and technological standards were part of the Local Plan or building codes
- the issue of affordable housing for local residents and the need for more affordable schemes run with Local Housing Associations

The Planning Policy Team Leader and Group Head of Planning provided Members with responses to all points raised during the debate, including:

- any Local Plan under the new system would still have to set out a housing requirement and that the Government's standard housing methodology would provide the starting point though housing numbers would ultimately be determined by the economic and sustainability ambitions and evidence of the Local Plan
- the proposal in the Levelling Up bill to remove the need to demonstrate a 5-year housing land supply but that only relating to those Authorities with an up-to-date Local Plan
- the lack of detail from Government around timeframes within the Levelling Up bill and, due to the significant changes made of the previously proposed bill, a considerable amount of uncertainty for planning at the moment
- the need for a 15-year housing trajectory under the current rules if the Plan were resumed
- how getting a Local Plan adopted would offer protection against unsustainable, unwanted or 'by appeal' development, and that this would be for a longer period of time under the proposals in the Levelling Up bill

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- confirmation that within the Housing policy section of the Local Plan adopted in 2018 there was a requirement to ensure delivery of housing numbers over 2 years and that failure to do so was a trigger to review the Plan, which was completed in 2019 and led to Full Council's resolution to update the Local Plan
- that different standards for energy consumption etc could come under the Local Plan if the appropriate evidence was obtained and the Council was able to convince an Inspector that it was viable to impose different standards
- that whilst the Local Plan may be unattractive to Members for political reasons, Officers believed the benefits of preparing one outweighed these reasons
- that the details around housing numbers were a discussion for a later date and were not a reason to stop the recommencing of the progress as they were simply not knowable, beyond an indication, at this stage
- that if the Council chose not to pursue a Local Plan Update that did not mean it would not necessarily end up with one as Government could impose one which it might find less favourable, and the decision to not resume might ultimately take power away from the Council

Following the debate, a request was been made that the voting on the recommendation be recorded. The recommendation was then proposed by Councillor Thurston and seconded by Councillor Coster.

Those voting for the recommendation were Councillors Coster, Goodheart, Jones, Lury, Thurston and Yeates [6]. There were no votes against and Councillors Bower, Chapman, Edwards, Elkins and Hughes abstained from voting [5].

The Committee

#### RECOMMEND TO FULL COUNCIL

That the Arun Local Plan update be resumed.

#### 53. ARUN INFRASTRUCTURE TOPIC PAPERS - A27 JUNCTION IMPROVEMENTS; WASTEWATER CAPACITY; WATER NEUTRALITY; HOUSING MARKET ABSORPTION

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which provided a progress update on the emergent infrastructure issues affecting plan making under the 'Duty to Cooperate', to be addressed as part of the preparatory work to inform Arun's Local Plan update, when this resumed. It was confirmed that the Housing Market Absorption Study was no longer part of this report and would not be brought to this meeting. He highlighted:

- the ongoing work involved in the Duty to Cooperate with Chichester District Council given Chichester's changed approach and potential impacts to infrastructure and housing number requirements
- continuing talks with Southern Water about wastewater capacity



- establishing communication with Natural England and the Environment Agency about water and nutrient neutrality
- non-strategic development infrastructure, accumulative impact and its role in traffic mitigation
- for the Local Plan update, that the topic papers where appropriate become Statements of Common Ground, to set out clearly with our infrastructure partners and Local Authority neighbours, what we do and do not agree with and where any evidence gaps are, and these then can be used at examination to support the Plan in cases of dispute.

Members (and non-Committee Members invited to speak) then took part in a full debate on the item where a number of points were raised including:

- the 'Duty to Cooperate' not being in the Levelling Up bill but common sense to discuss these matters with our neighbours. The closed Oving crossing on the A27 was given as an example of the impacts on traffic and infrastructure across wider areas
- concerns over the actions of Southern Water on water neutrality in exporting water outside of the District, the 'Duty to Cooperate' being paramount and the need for assurances that Arun fully understands Southern Water's forward capital programme and that it supports the Council's endeavours
- the extended timescales of many third party providers and the challenges in delivering multi-party projects
- recognition of the current work involved with achieving water and nutrient neutrality and what still needed to be done (removing rainwater from the sewage system, technological improvements into new housing, water efficiency and the Water Cycle Study, nutrient neutrality in Pagham)
- the need to engage with Portsmouth Water seeking clarification and resolution of their self-confessed network capacity issues
- Pagham Harbour and the need for nutrient assessment in order to work towards achieving nutrient neutrality
- the difficulty of getting a meeting with Natural England regarding nutrient neutrality
- surface water penetration into the sewage system being an issue particularly for older properties and reducing the amount of older housing stock as a solution to this infringement

The Planning Policy Team Leader and Group Head of Planning provided Members with responses to all points raised during the debate, including:

- Officers having been engaged with Southern Water for the last year on their strategic 25-year drainage and wastewater management plan, of which a draft version would shortly be open to consultation. It was hoped that a consultation response could be reported to the next Committee meeting on 27 July 2022
- explanation that a Water Cycle Study would look at the building regulations needed to achieve the efficiency standard of 110 litres per person per day, and what consequences might follow any breaches to the Water Framework Directive on water quality and abstraction

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- there were indications that Natural England had started work on Pagham Harbour in terms of trying to work out what gaps in information they had regarding the quality issues, but that due to the timescales involved the Council expected not to hear anything further until next year
- the securing of a meeting with Natural England was ongoing

The recommendations were then proposed by Councillor Bower and seconded by Councillor Hughes.

The Committee

RESOLVED – To

1. Consider the progress made and outstanding matters in relation to the infrastructure topics;
2. Agree that officers continue to engage with providers on clarifying issues and to identify potential solutions via drafting Statements of Common Ground, which will support consultation responses to plan making authorities and infrastructure providers and help to identify the resources needed to ensure that necessary evidence (e.g., water neutrality) is procured to support Arun's Local Plan update (when it resumes) under the 'Duty to Cooperate'.

54. ARUN HOUSING DELIVERY TEST RESULT 2021

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which briefed the Committee on the annual Housing Delivery Test result for November 2021 which was published by Government on 14 January 2022. It was the national indicator on housing delivery and compared the previous three years' housing delivery to the housing requirement over the same period.

Members then took part in a full debate on the item where a number of points were raised and responded to by the Planning Policy Team Leader, including:

- being pleased to hear that a consultant was being taken on to look at outstanding planning permissions with the aim of moving them along the system
- the impact of the 20% buffer in delivering the revised housing numbers

The Committee noted the report.

55. ARUN LOCAL PLAN UPDATE - TOURISM HOSPITALITY AND VISITOR ECONOMY STUDY

Upon the invitation of the Chair, the Planning Policy Team Leader presented the report which provided a summary of a review undertaken into Arun's visitor economy. The study sought to provide a review of the provision of tourism infrastructure across

the Arun District planning area alongside an assessment of future demand, including how the sector might grow and the spatial implications of this growth in supporting emerging planning policy in the new Local Plan. He highlighted the findings of a study done on the tourism and visitor accommodation sector and its importance to the local economy, with the District receiving 4 million visitors and direct spend of £221 million supporting over 4,000 full-time equivalent jobs.

Members then took part in a full debate on the item where a number of points were raised including:

- the rise in the number of AirBNB accommodation in the area, especially in Arundel
- the impact of the District's demographics on the accommodation requirements of visitors
- the lack of mentioning significant stakeholders in the report (the Town Councils, the Regeneration Board, Bognor Regis BID) who are coming together to support regeneration across the District
- Bognor Regis having needed a mid-range mid-priced hotel for a long time
- support for appropriate AirBNB accommodation in the area as it was what people wanted
- an increase in the Leisure and Hotel sector resulting in a corresponding increase in jobs whilst unemployment in the area was significantly below the national average, and the need to coordinate to ensure a labour supply (with the past experience of Butlins having to accommodate additional staff in order to expand given as an example)
- the need to reinvigorate relations with Northbrook College which offered a range of Leisure and Hotel sector courses
- previous difficulties in attracting hotels to the area and whether a specific allocation of a budget could be used to help facilitate interested parties
- concern for holiday accommodation development in the countryside and a preferred focus on town development
- the need to support the delivery of good quality events with good quality accommodation and associated infrastructure (for example, park and ride)
- the need to consider different types of people and the different types of experiences they may be seeking
- support for smaller developments that could be countryside-based (e.g. camping, glamping)
- the need for any development to take onboard Arun's key theme of sustainability
- from a planning perspective, the lack of hotels in the area could be telling us something about the market and the need to know more about the expected demand and what needed to be catered for before decisions on what and where could be made
- a clear indication that the Council was seeking to support tourism across the District

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Following further discussion Cllr Thurston proposed an amendment, that 'sustainable' be added to recommendation 2 before 'tourist accommodation development' so that the recommendation would read:

2. The Council take a 'pro-active' approach (as set out in section 1.7 bullet 4) to bring forward sustainable tourist accommodation development through working with stakeholders to identify suitable sites opportunities, including examining the Council's own estate;

This was seconded by Cllr Jones. The amendment was then debated by Members where a number of points were raised including:

- defining 'sustainability' in the ecological sense as defined by the Council's greener initiatives and carbon pledges, rather than financial sustainability, and businesses willing to work in that way
- problems with narrowing the definition of 'sustainable' and limiting or excluding other things that might also be necessary to a business' sustainability

Following a vote, the amendment was NOT CARRIED.

The substantive recommendations were then proposed by Councillor Bower and seconded by Councillor Hughes.

The Committee

RESOLVED – That

1. The Tourism Hospitality & Visitor Economy Study form part of the evidence base for the Local Plan Update and be published on the Council's evidence web pages;
2. The Council take a 'pro active' approach (as set out in section 1.7 bullet 4) to bring forward tourist accommodation development through working with stakeholders to identify suitable sites opportunities, including examining the Council's own estate;
3. The Council support the future provision of a new large scale holiday site either through an allocation in the Local Plan Update, or through the use of an appropriately worded policy;
4. The Council support policies within the Local Plan update that encourage the forms and range of hotel and visitor accommodation identified under section 1.10 of this report;
5. The Study be referred to the Economy Committee to consider and agree appropriate economic recommendations.

56. BIODIVERSITY NET GAIN STUDY - UPDATE

The Chair confirmed that this item was now withdrawn and had been deferred to the next meeting of the Committee on 27 July 2022. The Chair explained that it was deferred because there was a need to check the cross boundary implications of the study with neighbouring authorities and stakeholders before the item could be properly considered. In addition, there were some recent initiatives on nature recovery projects that related to Arun that were not yet reflected in the study and it was considered that these would be helpful for inclusion.

57. OUTSIDE BODIES

The Committee noted one report from Councillor Thurston on the South Downs National Park Authority.

58. WORK PROGRAMME

The Planning Policy Team Leader noted that Southern Water's Drainage and Wastewater Management Plan consultation started in June and a consultation response might need to be added to the Work Programme. He also confirmed that work relating to the Local Plan update timetable via the Local Development Scheme (LDS) would be coming to the next meeting. One Member suggested the inclusion of a seminar for Members on the issues of sustainability.

The Committee then noted the Work Programme.

(The meeting concluded at 8.15 pm)

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 27 JULY 2022

#### REPORT

**SUBJECT: Response to Southern Water's Drainage and Wastewater Management Plan (DWMP) Consultation**

**REPORT AUTHOR:** Charlotte Hardy, Senior Environmental Assessment Officer

**DATE:** March 2022

**EXTN:** x 37857

**AREA:** Planning

#### EXECUTIVE SUMMARY:

Southern Water are consulting on a Drainage and Wastewater Management Plan (DWMP) over the period 13 June to 5 September 2022. This DWMP document has been split into 5 papers, which cover the overall strategy and approach Southern Water intends to take over the next 25 years for the wastewater catchments they serve. This includes the scale and type of investment, prioritisation, and timings. The DWMP comments on partnership opportunities and with respect to DEFRA's intentions towards storm overflows. The headline issues to be raised as a result, will be contained in the Council's proposed response to be published before the meeting.

#### RECOMMENDATIONS:

That Planning Policy Committee: -

1. Considers and agrees the proposed consultation response to the Drainage Wastewater Management Plan consultation (DWMP).

#### 1. BACKGROUND:

1.1 This is the first formal public consultation by Southern Water on a draft Drainage and Wastewater Management Plan (DWMP) following informal scoping and engagement workshops (reported to members on 30 November 2021). The DWMP consultation runs from 20 June to 5 September 2022.

1.2 The DWMP consultation comprises Southern Water's regional plan with 5 accompanying topic documents about investment needs:-

1. Internal Sewer Flooding.
2. Sewer Condition and Groundwater Pollution.
3. Storm Overflows.

4. Compliance and Pollution; and
5. The Environment.

1.3 This report discusses the DWMP topics issues and proposals affecting the 3 relevant wastewater catchments covering the District. The Topic points below apply for each catchment except where specific catchment or location references are made. The 3 catchments are: -

- Ford – catchment includes the two main urban areas of Littlehampton and Bognor Regis. In Littlehampton this extends to the north to include Lyminster and Crossbush and west up to Burndell Road. In Bognor this covers the main central town and along the coastline over to the east until it merges with the Middleton and west until it reaches the extent of Aldwick parish.
- Lidsey – catchment covers the main inland villages of Yapton, Barnham, Eastergate, Westergate, Aldingbourne and Fontwell, up to the A27 where the planning remit of Arun District ceases. It also extends down to the south to include the built-up area of Middleton and further east around Atherington.
- Pagham – catchment purely covers the main built areas around Pagham Harbour, so to the north the parts of Rose Green in Pagham parish with its western extent being the village of Runcton.

#### **Internal Sewer Flooding**

1.4 The risk of internal flood is the first of the planning objectives that the DWMP is required to cover with individual objectives for internal flooding (PO4) and for external flooding (PO7). This is considered to be where flooding occurs within the home or business or restricts access to such. It is stated that experience and data show the main causes to be:-

- Inappropriate use or misuse of toilets and sinks for the disposal of fats, oils and grease (FOG), as well as ‘unflushable’ items
- This is an industry wide rather than individual company issue.
- Internal flooding caused as a result of surface water flooding and the collapse or bursting of sewers

1.5 Due to this and feedback during some of the early stakeholder workshops Southern Water have added an additional specific planning objective relating to surface water.

1.6 In terms of the FOG and ‘unflushables’ issue, it is identified that the most effective method for addressing this is at source by influencing customer behaviour. The cost of education programmes can be difficult, although feedback from partner organisations has been positive. The national reporting method for this issue tends to count all properties flooded regardless of the severity

1.7 Southern Water are currently investing £35million through the current review period (2020-2025) to create smarter sewer networks through digitising and installing around 20,000 sewer level monitors. Another action being carried out to reduce internal flooding is carrying out surveys of where tree roots are or may ingress into their sewer network and clearing them.



- 1.8 The Investment Needs for Sewer Flooding only suggests actions to be taken in the Ford catchment, although these are all intended in the short term that correlates with the next price review period of 2025-2030.
- 1.9 To address internal flood issues across the whole catchment they will enhance maintenance, carry out further Customer Education Programmes and do Proactive Jetting.
- 1.10 Specifically with respect Surface Water Management issues across the catchment, a Study is intended to Model the Improvements, including flows for storm and dry weather flows along with a model calibration.
- 1.11 In terms of Sewer Collapse or Bursts, within this catchment it is intended that at the locations of Rustington and Felpham CCTV surveys are carried out to check the sewer integrity, and where necessary, carry out relining and enforcement.
- 1.12 To address Annualised Flood Risk catchment wide, for the Lidsey catchment in the short term, it is intended to do a Study to Model Improvements, including flow surveys for storm and dry weather flows plus calibration of model via potential for impermeable area surveys. For the medium term, in the West Barnham location, it is expected Southern Water will attenuate excess flows in the sewer network through the use of storage tanks to reduce risk of flooding. Costs are based on storage tanks, although surface water separation is the preferred approach.

### **Sewer Condition and Groundwater Pollution**

- 1.13 Poor condition sewers can lead to several risks:
- Blockage, collapse, infiltration and releasing sewage.
  - Seeping into groundwater and affecting its quality; or
  - Vice versa which increases the speed of the flow into treatment works and can cause wastewater to be released automatically through storm overflows.
- 1.14 Causes of can be attributed to:-
- Approximately 50% are a result of poor types of construction material, along with age affecting a large portion of rising mains.
  - Bursts occurring for a variety of reasons, such as deterioration of materials; ground movements; and more extreme temperature changes.
  - Operational pressure on assets due to warmer, wetter winters and population growth with potential for these to occur more frequently in future.
- 1.15 Southern Water expect that 8km of rising main replacements shall be delivered alongside a major investment covering 3.5km in one location, at the same time as improvements to their operational control centre, during the current review period of 2020-2025.

### **Storm Overflows**

- 1.16 Storm overflows are of course a major part of the feedback given in the first

engagement response Arun sent back to Southern Water on this work (Item 8 of PPC 30 November 2021 meeting), and the earlier letter about discharges sent in December 2021.

- 1.17 Storm overflows were originally designed into combined drainage and wastewater systems such that a level of dilution is achieved in the system or waterbody before treatment and discharge into rivers. The EA issues permits to water companies to govern when storm overflows are allowed to discharge into the environment, which are based on pollutant concentration limits. The benchmark is a dilution ratio of 8, meaning the flow of the river under dry conditions must be 8 times greater than any flow of water from the wastewater works. The result being released water should be at a similar dilution as the treated water
- 1.18 The second factor linked to above is the frequency of discharges. Storm overflows were designed into systems to discharge around 40 times per year, with an exception being to bathing and shellfish waters. For storm overflows built since the EU Directives on these came in to being, the frequency of discharges should not exceed 10 times per year for bathing waters and 3 times per year for shellfish waters. Sewers are only capable of conveying flows up to their design capacity, anything above this automatically discharge to reduce the risk of flooding to properties from sewage.
- 1.19 Some of Southern Water's treatment works are fitted with storage tanks to capture excess flows arriving at the works. They are designed to initially store the excess flows but once their capacity is exceeded will discharge to receiving waters. The overflows at the works tend to have the greatest capacity and so some investment will be to enlarge the capacity of these storm tanks at several works. It should be remembered that the Environment Act has placed 5 new obligations on water companies with respect to storm overflows operation and reporting.
- 1.20 Linked to this DWMP work, Southern Water established a Storm Overflow Task Force in 2021 to look at dealing with connected issues differently. One of the main recommendations so far has been to establish 5 pilot projects and to focus on the use of sustainable approaches that stand the test of time and perform into the future with changes to our climate. All are based on the use of nature-based solutions and helping to keep surface water out of the sewer systems and deliver environmental and social benefits. The Task Force is expected to report in summer 2022 and so the outcomes will be integrated before publication of the final DWMP in 2023.
- 1.21 For the 3 catchments in Arun District the following actions are set out in the short term (2025-2030) against each respective catchment below: -
  - Pagham – Study modelling storm and dry weather flows, along with model calibration. Additionally, at Summer Lane location, to attenuate excess flows using storage tanks to reduce risk of flooding;
  - Lidsey – Attenuate excess flows in sewer network through storage tanks to reduce risk of spill events. Surface water separation is still preferred option. Additionally at Marshall Close Barnham CSO, to attenuate excess flows in the sewer network through storage tanks to reduce spill events, although surface

water separation is still the preferred option.

- Ford – Construct a number of storage tanks at a number of the existing pumping works and/or combined storm overflows, to reduce the frequency of spill events. These are:
- Broadmark Lane, Rustington x2
- Sea Rd, Littlehampton
- Esplanade, Bognor Regis
- West Park, Bognor Regis
- Bognor Main
- Bognor Regis Foreshore
- Aldwick Avenue

### **Compliance and Pollution**

1.22 There is nothing intended in any of the catchments in Arun District relating to water treatment compliance. The main issues in this aspect relate to Dry Weather Flow (DWF) Compliance. DWF is the average daily flow rate into a treatment works during dry weather, so without the addition of any rainwater. This as mentioned with respect storm overflows is what the EA base the permit level amounts of discharges on. Importantly, this figure will change seasonally due to changing levels of sewer infiltration and population numbers.

1.23 Though there is a national objective connected to compliance of the works into receiving waters, there was none relating to dry weather flows and so Southern Water following earlier engagement on the DWMP with partners, has added this additional objective.

1.24 An increase in DWF can require treatment improvements to maintain the effluent standards of discharges. Infiltration is a significant, increasing issue across the Southern Water's area, due to increased groundwater levels, placing greater pressure on the capacity of treatment works to meet permits. It is therefore vital that groundwater is kept out of the sewer systems to increase capacity available to provide for current and future housing need of the South East. Southern Water specifically mention that, although they have taken account of the most accurate predicted development growth expected, that in the medium to long term, they need to increase their knowledge of how local plans develop.

1.25 Currently, the need for tighter permit controls is not factored into the national requirements. However, as it is expected that those controlling nitrates will become stricter, Southern Water have been working with EA to align the two respective processes. This is hoped to allow a fundamental shift to long term planning and protection of the environment. To deal with wastewater compliance they intend to:-

- Be fully compliant with all permits.
- Work with EA to understand and plan for long-term permit changes, so that in the next DWMP they can plan for relocation of assets and invest in new technology to meet tighter permits; and
- Further align water resources and wastewater resources through exploring opportunities for greater recycling and re-use of water in the South East.

- 1.26 Specifically for the Pagham catchment and wastewater compliance, in the short term they will review the permit for the Summer Lane works with the EA and deliver associated works to increase capacity of the works. In the medium-longer term, the Lidsey and Ford catchments will need to review the permit for the works with the EA and to deliver associated works to increase capacity of the works.
- 1.27 In terms of pollution and risk from the wastewater treatment works, the main causes are identified as blockages; rising mains (where water is pumped under pressure to higher level); electrical and mechanical breakdowns; and other operational types. Many of these issues are being dealt with in the next review period of 2025-2030. Overall it is intended that enhancing the reliance of assets, will deal with pollution matters including the consent reviews and delivery of associated works in the longer term. Short term, pollution compliance at Barnham Westergate is intended through enhanced maintenance, along with customer education and proactive jetting.

### **The Environment**

- 1.28 Due to the high number of 'receiving waters' also being designated sites (with national and international environmental protection, along with their regional importance), it is vital that they are protected. As a result, after talking with partners, Southern Water have therefore included eight related objectives above the standard 6 national ones required. 4 of these are specifically about the quality of surface waters in rivers and seas. These are:
- Achieving Good Ecological Status/Good Ecological Potential (GES/GEP).
  - Securing Nutrient Neutrality.
  - Improving Bathing Waters; and
  - Protecting Shellfish Waters.
- 1.29 As a result, this section has elements covering all of these subjects due to their linked nature impact to making improvements to the environment. Rather than good status, GEP applies to all 'artificial' or 'heavily modified' waterbodies, including those that have been modified for flood protection, navigation, recreation or storage.
- 1.30 In this first cycle of DWMPs Southern Water are focusing on understanding where future investment may be needed and could be achieved through collaborating with partners. They intend to focus their investment in catchments where the EA has confirmed that one of the reasons for not achieving GES or GEP is due to their operations.
- 1.31 Though many rivers and streams within Arun District may be classed as heavily modified, only Aldingbourne Rife has been failing the required standards, resulting from being downstream of the Tangmere treatment works, which has been clearly mentioned within the adopted Arun Local Plan 2018 and associated documents such as the EA's River Basin Management Plan for the South East. As a result of this, the one project identified (relating to the first objective that affects Arun), within the Ford catchment, in the short term, for the Aldingbourne Rife is for a study to be undertaken to understand the risks and sources that Ammonia is having on linked waterbodies.

- 1.32 Another study project is suggested for the Pagham catchment due to the Harbour and the Solent and Dorset Coast. With respect to nutrient neutrality, it is well known that Arun is the only District currently that has not been directly affected by this issue but is surrounded by those that have. Due to its international importance, a precautionary approach is being applied to Pagham Harbour to ensure it is afforded proper protection. Wastewater that drains to a Habitat site must ensure that it does not add to the existing nutrient burden that may cause any deterioration. At present, the overall approach is for a nutrient neutral approach to be taken. Oneway this can be done is to ensure that all surface water runoff is equal to, if not lower than, that which it begins as. As well as addressing existing contributors, it is vital that projected growth can be accommodated without adding to the load via wastewater systems. It is worth noting that EA have begun work to assess the ecological status of Pagham Harbour (as reported to Planning Policy Committee 7 June 2022).
- 1.33 Similarly, a study project has been included for the Lidsey catchment, both due to the proximity to the Lidsey Rife and the Solent and Dorset Coast, to develop a nutrient budget and to understand the risks and sources impacting Habitat sites. A study will aid with achieving GES linked to a phosphate determinant for the Lidsey Rife.
- 1.34 Finally, with respect to the last 2 objectives (section 1.31 above) in terms of bathing and shellfish waters, only the first of these applies to the catchments in Arun. As a company Southern Water intend corporately to maintain the bathing waters at “excellent” and improve on this standard by 2024/25. The overall intention presented in this DWMP document is to achieve this by making their networks more resilient. However, one project in the Ford catchment has been identified specifically in this respect. This is to construct a storage tank or separate surface water to reduce spill events (see under storm overflows further above), in the short term.

### **Next Steps**

- 1.35 Due to the short amount of time between the commencement of the consultation and the committee deadline for submitting reports, the draft consultation response for Arun will be circulated separately before the meeting. Links to the consultation documents are available below. A copy of the draft response will also be placed on the relevant Council web pages.

## **2. PROPOSAL(S):**

That the Planning Policy Committee note the content of this report and agrees that the letter sent out prior to the meeting forms the basis for the Council’s formal response to the DWMP consultation.

## **3. OPTIONS:**

The following options are available:-

- To agree the response; or
- Not to agree the response.
-

<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		x
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land	x	
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
<p>This response will inform the progression of the DWMP and identify areas where investment priorities should be focused for improvement of the drainage and wastewater infrastructure network. This may help to secure existing and future property, assets and human health, from the risks of flooding arising from development and climate change</p>		

#### **7. REASON FOR THE DECISION:**

The Council needs to respond to a public consultation by Southern Water to ensure that all concerns and issues connected with the sewerage, drainage and water supplies currently and in the future are accounted for and addressed in infrastructure planning needed for existing customers and future customers in Arun.

#### **8. BACKGROUND PAPERS:**

1. PPC Papers and Minutes from 30 November 2021 (Item 8) - [Agenda Template \(arun.gov.uk\)](https://www.arun.gov.uk)
2. Southern Water's Drainage and Wastewater Management Plan consultation – <https://southernwater.co.uk/dwmp>

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE

ON 27 JULY 2022

**SUBJECT:**

The provision of resources to assist the Council on matters relating to the A27 Arundel Improvements.

**REPORT AUTHOR:** Karl Roberts, Director of Growth  
**DATE:** May 2022  
**EXTN:** 01903 737760  
**AREA:** Director of Place

**EXECUTIVE SUMMARY:**

The report seeks budgetary provision to enable the Council to engage a professional resource in relation to the National Highways A27 Improvement scheme at Arundel.

**RECOMMENDATIONS:****The Committee**

1. Approves seeking budgetary provision of up to £50,000 in 2022/23 and to employ, on a 'call-off' basis, a consultant to support Arun's involvement with the National Highways A27 Arundel Bypass scheme
2. Recommends to Policy and Finance Committee that Full Council be requested to authorise a Supplementary Estimate of £50,000, which is equivalent to £0.79 on a Band D Council Tax Bill.

**1. BACKGROUND:**

- 1.1. The Council, in 2019, resolved (Minute 264) that the commissioning and submission of any Local Impact Statement required as part of a formal Development Consent Order process shall be delegated to the Director of Place. The Council would support the principle of working collaboratively with West Sussex County Council, Arundel Town Council, Walberton Parish Council, Lyminster and Crossbush Parish Council and the South Downs National Park Authority, to submit a single Local Impact Statement on behalf of all the named authorities.

- 1.2. It hasn't yet been necessary to commission such a document but that time is fast approaching. The Engineering Services Manager has always been the Council's first point of contact (FPC) relating to the National Highways scheme to improve the A27 at Arundel. He has provided input to the scheme on a range of technical matters within his remit and has coordinated technical input from a range of other relevant Arun Services (e.g. Landscape, Planning and Heritage); he has also led on the responses to the various consultations.
- 1.3. However, he has given notice that he intends to retire at the start of August, after nearly 48 years' service at Arun.
- 1.4. This coincides with the scheme about to move into a more intense technical phase, leading up to the Development Consent Order (DCO) submission by National Highways in the Autumn. In addition, there will continue to be the need for a coordination role, so that the Council may respond to, and have input to, the detail design and eventual delivery of this project; seen as a regionally important infrastructure scheme and one which should benefit Arun in a number of ways.
- 1.5. As indicated above, part of the DCO process involves the Council producing a Local Impact Report. Whilst the Engineering Services Manager may not have produced this report, he would have directed its development.
- 1.6. If the Council is to continue to play its part in this project, there are two primary options; to internally resource-switch or to 'buy-in' external resource.
- 1.7. The former has been explored but with current resourcing issues and other major projects underway, or about to start, this is not considered to be a viable option.
- 1.8. The latter option, with careful formulation of a brief, can see all of the necessary tasks achieved.
- 1.9. It is proposed that a resource is sought to undertake the necessary tasks on a retained 'call-off' basis as the requirement to undertake work on behalf of the Council will vary considerably in terms of when it needs to be undertaken.
- 1.10. It is anticipated that the cost of providing this arrangement will be up to £50,000. Efforts will be made to offset costs where possible, for example by seeking contributions from National Highways to undertake specific pieces of work to support the DCO submission, in much the same way as developers currently contribute to Planning Performance Agreements.

## **2. PROPOSAL(S):**

### **. The Committee**

1. Approves seeking budgetary provision of up to £50,000 in 2022/23 and to employ, on a 'call-off' basis, a consultant to support Arun's involvement with the National Highways A27 Arundel Bypass scheme
2. Recommends to Policy and Finance Committee that Full Council be requested to authorise a Supplementary Estimate of £50,000, which is equivalent to £0.79 on a Band D Council Tax Bill.



**3. OPTIONS:**

- A. Not to provide a continued input to the scheme;
- B. Internally resource-switch;
- C. Buy-in temporary external support (preferred)

**4. CONSULTATION:**

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		X
Relevant District Ward Councillors		X
Other groups/persons (please specify)		

**5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)**

	YES	NO
Financial	✓	
Legal	✓	
Human Rights/Equality Impact Assessment		X
Community Safety including Section 17 of Crime & Disorder Act		
Sustainability	✓	
Asset Management/Property/Land	✓	
Technology		X
Other (please explain)		

**6. IMPLICATIONS:**

Finance = Supplementary Estimate required

Legal = requirement to produce a Local Impact Report

Sustainability = input to various cross-cutting aspects, including carbon reduction, Biodiversity Net Gain

Asset Management/Property/Land = Arun owns various parcels of land on or near the route of the proposed bypass

**7. REASON FOR THE DECISION:**

To enable the Council to have a continued involvement in the delivery of the National Highways scheme to improve the A27 at Arundel.

**8. BACKGROUND PAPERS:**

None

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 27 July 2022

**SUBJECT: Planning Policy Work following Full Council on 13 July 2022**

**REPORT AUTHOR: Karl Roberts/Neil Crowther**

**DATE: July 2022**

**EXTN: 01903 737839**

**AREA: Growth**

#### **EXECUTIVE SUMMARY:**

Planning Policy need to consider the work that is going to take place within the Planning Policy Team in the short term as a result of the decision at Full Council not to resume preparation of a Local Plan for the district.

#### **RECOMMENDATIONS:**

That Planning Policy Committee endorse the proposed work outlined in the Appendix setting out what work can continue and what work is unable to be progressed at this time.

#### **1. BACKGROUND:**

- 1.1 Full Council at their meeting on the 13 July 2022 resolved to reject the recommendation of this committee to proceed with a review of the Local Plan. Therefore, for the present the Council's formal position on the preparation of a new Local Plan, as per previous resolutions is that the review process is paused. Debate at Full Council prior to taking this decision expressed concern over future housing numbers as well as uncertainty around potential future planning reforms.
- 1.2 The Council's constitution states that 6 months must pass before a previous resolution can be reconsidered. Therefore, this decision cannot be reconsidered until Jan 23 at the earliest. With the District Council elections due in May 2023, some 4 months later it is unlikely that the Council will wish to decide on whether to recommence the review or not until after the elections. Therefore, it is proposed that a report on preparing a new Local Plan is brought to the first available meeting of this committee after the elections in June 2023.
- 1.3 The purpose of this report is therefore to seek the Committee's agreement to the proposed work programme of the Planning Policy Team between now and June 2023. The attached Appendix indicates which work streams will cease, continue or start as a consequence of the Full Council resolution dependent upon whether this work was being progressed in order to inform a future Local Plan or not.

- 1.4 This report has been submitted as an urgent item because the next scheduled meeting is not until September which would mean a significant delay in securing the Committees support for the teams revised work programme. The Committee will note that it is proposed to undertake some work streams that will inform reports to be presented to the Committee in June 23 regarding the future content or preparation of a Local Plan review.
- 1.5 The work outlined in the Appendix that will have to pause until the Council decide to agree to prepare an updated Local Plan is primarily for the purpose of informing future planning policy. As Committee will be aware, it is only when a draft policy is prepared, following consideration of such evidence, that it would really become a material consideration in the determination of planning applications. Whilst the delay in preparing a Plan will have an impact on the ability to progress these matters, the delay would have only a limited impact upon the determination of applications/appeals because issues such as biodiversity, landscape, climate change etc are already dealt with in the current Local Plan. And will be considered against the presumption in favour. Obviously, the creation of new policy that may result in higher standards on these subjects would be delayed.

**2. PROPOSAL(S):**

To endorse the approach to different areas of work within the Planning Policy Team set out in the Appendix.

**3. OPTIONS:**

To not endorse the Appendix and to accept the risks outlined.

**4. CONSULTATION:**

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		

**5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)**

	YES	NO
Financial	x	
Legal	x	
Human Rights/Equality Impact Assessment	x	
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land		x
Technology		x
Other (please explain)		

**6. IMPLICATIONS:**

There are financial implications for not being able to progress some of the work outlined in the Appendix. There are legal issues for the continued absence of progress on updating the Local Plan. Sustainability and equality implications may stem from a delay in being able to set new planning policies to address these issues.

**7. REASON FOR THE DECISION:**

**8. BACKGROUND PAPERS:**

Appendix 1

<b>Study</b>	<b>Scope / Purpose</b>	<b>Output</b>	<b>Risk</b>	<b>Proceed Yes/No</b>
<b>2022/23</b>				
Biodiversity Net Gain (BNG) Study	Review and consolidate Biodiversity record of species and habitats compared to existing Biodiversity Opportunity Areas to identify correlation and gaps	Will assist Development Management (DM) interpretation of the national metric under the Environment Act 2021 and existing planning policy.	Work has been complete to stage 1 and will be presented to Planning Policy Committee.	<b>Yes</b>
Biodiversity Net Gain (BNG) Study		Signposting further BNG work to inform future policy formulation.	Stage 2 testing of scope to exceed 10% BNG metric for Arun to proceed. This cannot be commenced until the pause is lifted as it will inform future policy.	<b>No</b>
SFRA Phase 1: Environment Agency Flood Mapping Allowances	Map EAs update climate change allowances for the sources of flooding; pluvial; fluvial; sea level/coastal.	Will assist DM interpretation of the Environment Agency's Climate Change Allowances.	None. Work can inform Local Plan update sequential site assessment work when it resumes.	<b>Yes</b>
Arun Housing Market Absorption Study	Arun housing market absorption rates informs more achievable housing delivery trajectory	Evidence Study that may inform overall Local Plan housing target.	A lengthy pause may mean that this work may need updating. Draft study already received.	<b>Yes</b>
Sustainability Appraisal (SA/SEA/HRA)	To ensure that the plan development strategy and policies are sustainable and meets legislative regulations.	Sustainability Appraisal Environmental Report assessing sustainability of strategy and policies.	Work would inform future planning policy. With no commitment to a Plan this would be abortive work.	<b>No</b>
A27 Capacity Study	Informs ADC approach to	Evidence Study that will	Dependent on Chichester	<b>No</b>

	potential housing growth and cross boundary planning and spatial housing distribution.	inform future Local Plan policy in terms of infrastructure requirements as well as deliverability.	emerging plan evidence and Arun LP update Housing requirement. Unable to resolve cross boundary infrastructure capacity for the LP update until it is resumed.	
Waste Water Treatment Works (WwTW) Capacity	Informs WwTW Headroom for LP Update – Statement of Common Ground.	Alignment of WwTW infrastructure capacity with Development. Will inform policy in respect of infrastructure requirements, phasing and deliverability.	Delayed infrastructure planning to mitigate growth.	<b>No</b>
Water Neutrality	Duty to Cooperate Statements of Common Ground.	Informs cross boundary infrastructure provision e.g. Southern Water’s emerging Drainage & Waste Water Management Plan.	None. Duty to Cooperate ongoing – including preparation of Statements of Common Ground and responding to neighbouring authority plan making.	<b>Yes</b>
Water Nutrient Neutrality	Duty to Cooperate Statements of Common Ground.	Informs cross boundary infrastructure provision e.g. Southern Water’s emerging Drainage & Waste Water Management Plan.	None. Duty to Cooperate ongoing – including preparation of Statements of Common Ground and responding to neighbouring authority plan making.	<b>Yes</b>
Arun Secondary School Study Update	Refresh options for a deliverable school site.	Preferred Allocation for Secondary School.	None. Currently out to tender – addresses current Local Plan.	<b>Yes</b>
West Bank (LEGA) Evidence Study	Assess scope to improve the delivery of the LEGA.	Evidence study to inform decisions.	None. West Bank (LEGA) Evidence Study will address current Local Plan.	<b>Yes</b>

Climate Change Study – Policy Standards	Reviewing DM policy standards for carbon reduction, renewable energy, climate change resilience and place making.	A new set of standards that would be contained in a new Local Plan.	Work would inform future planning policy. With no commitment to a Plan this would be abortive work.	<b>No</b>
Vision & Objectives	Council aspirations and delivery timescales - shape the required Local Plan evidence.	Local Plan period and scope of supporting evidence.	This would be abortive work. Delay will impact on plan making timetable. Will be considered in June 2023 if the Plan update is resumed.	<b>No</b>
<b>2023/24</b>				
Housing Economic Development Needs Assessment (HEDNA).  Local Housing Objectively Assessed Need (OAN) starting point using Standard Housing Methodology.	OAN based on the Standard Housing Methodology and balance of jobs and commuting.	Evidence Study showing the housing target and components of housing need (older people, student and special needs) balanced with jobs target to achieve a sustainable commuting balance.	Planning Policy Team would be preparing briefs, tenders, and contracts ready to commence study on 1 April 2023. Commissioning can no longer progress without commitment to a Local Plan Update.  Housing Land supply and Appeal decisions.	<b>No</b>
Strategic Housing Market Area Update.	Identifying the housing market areas that shape cross boundary planning.	Evidence Study to confirm the Strategic Housing Market area that the district falls into in relation to house prices and broad rental market area, travel to work and cross boundary provision.	Planning Policy Team would be preparing briefs, tenders, and contracts ready to commence study on 1 April 2023. Commissioning can no longer progress without commitment to a Local Plan Update.	<b>No</b>



Functional Economic Market Area and forecast.	Identifying the economic geography for Arun and its relationship with other economic areas to identify strengths and weaknesses and opportunities for cross boundary planning.	Evidence Study to confirm the Functional Economic Market area that the district falls into in relation business sectors and travel to work. This will inform quantum of employment allocations as well as location.	Planning Policy Team would be preparing briefs, tenders, and contracts ready to commence study on 1 April 2023. Commissioning can no longer progress without commitment to a Local Plan Update.	<b>No</b>
Place Making – 20 minute Communities (urban capacity)	Identifying the spatial alternatives and options for delivering growth in the right places.	Evidence Study to shape place making within a context of reducing the need to travel, while increasing access to services. For example, through active travel, technology and public transport.	Planning Policy Team would be preparing briefs, tenders, and contracts ready to commence study on 1 April 2023. Commissioning can no longer progress without commitment to a Local Plan Update.	<b>No</b>
Arun Transport Model - LP Forecast Model Runs.	Identifying the spatial impact of development and any necessary provision of transport mitigation infrastructure phased over the plan period.	Evidence Study to provide an Arun district-wide Transport Model with which to test development options and locations and necessary transport mitigation.	<p>Planning Policy Team would be preparing briefs, tenders, and contracts ready to commence study on 1 April 2023. Commissioning can no longer progress without commitment to a Local Plan Update.</p> <p>Significant delay may require an expensive new model to be commissioned.</p>	<b>No</b>

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 27 JULY 2022

#### REPORT

**SUBJECT: Arun Transport Model Update**

**REPORT AUTHOR:** Kevin Owen, Team Leader Planning Policy and Conservation

**DATE:** June 2022

**EXTN:** x 37857

**AREA:** Planning

#### EXECUTIVE SUMMARY:

This report updates the Planning Policy Committee on the Arun Transport Model Phase 1 work commissioned in 2021 for the purposes of the evidencing the Local Plan update (when it resumes) transport impacts and necessary mitigation schemes.

#### RECOMMENDATIONS:

That the Planning Policy Committee:-

1. Notes Progress on Phase 1 of the Arun district-wide Arun Transport Model
2. Agrees the A259 Local Model Validation Report (i.e. includes Arun district-wide ATM) be uploaded to the evidence web page to inform the Local plan Update when this resumes;
3. Notes that the work on the further phases of developing the ATM are paused until the Council resolves to resume the Local Plan update.

#### 1. BACKGROUND:

1.1 In January/February 2021 Arun District Council (ADC) and West Sussex County Council (WSCC) commissioned joint work preparing a district-wide Arun Transport Model (Background Paper 1). This district-wide Arun Transport Model (ATM) has been developed using WSCC's work on the A259 SATURN Transport Model for the East Corridor Enhancement scheme between Bognor Regis and Littlehampton.

1.2 Arun's' share of the cost for developing the district-wide ATM was £53.5k. Such collaborative work will help to establish a cost-effective evidence base to support: -

- The outline and full business case for proposed upgrades to the A259 between Bognor Regis and Littlehampton known as the A259 East Corridor Enhancement scheme (A259 ECEs); and
- A district-wide ATM to allow future transport modelling for the Local Plan Update including testing of development options and mitigation

- The district-wide ATM will include a detailed area (i.e. Arun District including the local planning authority area as well as that area within South Downs National Park); a 'Buffer Network' including Chichester and Worthing; an 'External Area' - wider hinterland.
- 1.3 The adopted Arun Local Plan 2018 relies on the (now outdated) Arun Transport Study 2016, and the Enterprise Bognor Regis Transport Review 2017 both of which were based on a revalidated version of the older 2011 West Sussex County Transport Model. That model can no longer be reliably supported or validated by National Highways (NH) for future transport work because it uses outdated methodology and assumptions, and it would now be inconsistent with WSCC's current work on the A259 ECEs transport model.
- 1.4 The benefits in undertaking a scaled-up ATM, using the A259 ECEs work, includes not only economies of scale but also ensuring there is comparable modelling data for future planning purposes.
- 1.5 Comparatively, if ADC were to commission a whole new strategic transport model, the commission (from beginning to end) could cost in the region of +£200,000 and would take up significant officer time.
- 1.6 However, with slippage on the Local Plan timetable, there will be a need to ensure that the work on developing the district-wide ATM is kept as up to date as possible. This can be done through periodically collecting additional traffic flow data for validation minimising the risk of forecasting uncertainty. For example, since the A259 2019 base model assumptions were established, there has been a need to account for the impacts of post Covid-19 travel behaviour and now, emergent significant inflationary pressures impacting on travel choice. This can be done mostly by accessing data from:-
- WSCC's traffic flows database (monitoring at the permanent sites), along
  - National Highways' "Webtris" data for the A27
  - Traffic counts on roads near to Strategic Allocations if they are remote from any of the permanent traffic data sites but near to a site where data is collected for this ATM work.
- 1.7 Such validation will be captured in technical notes to address any areas of flow divergence and assist in interpreting the ATM model including calibrating individual junction models for those impacted junctions which require closer analysis. These top up costs above, are a relatively cost-effective way of maintaining the ATM compared to building a new one.
- 1.8 If there is further delay to the Local Plan or if more significant divergence in flow is found, then an intermediate step would be to refresh the model.
- 1.9 The A259 Local Model Validation Report has recently been approved by National Highways. This enables the model to be used on the basis that the whole District is within the calibrated/validated study area rather than just the A259 corridor between Chichester and Littlehampton (and parallel/connecting routes including A27/A284 and A29, B2233 and B2259). The base year model and reporting is now finalised.

### **Next Stage of ATM Development**

- 1.10 Officers have budgeted a start of work in 2023/2024 on Phase 2 of the district-wide ATM. This would involve drafting and agreeing a brief with WSCC for the requirements set out in section 1.11 below.
- 1.11 Beyond the checks on changes to base model conditions since 2019 the next principal task on preparing the ATM for Local Plan use (rather than A259 transport scheme appraisal) will be to develop a revised 'reference case' forecast for the Local Plan. The 'reference case' will:-
- Replace TEMPro background growth assumption within ADC so that all planned/non-committed development within the local planning authority area, plus the windfall allowance is included in the Local Plan scenarios, so that the mitigation strategy should accommodate for all development in a planning authority area.
  - Update the uncertainty log and review the uncertainty log categories for committed development and transport assumptions to make sure that they are appropriate for the different nature of the study and if necessary, update totals again.
  - Develop a forecasting year which matches with end of Local Plan period.
- 1.12 However, the Council at the meeting of 13 July resolved not to lift the current pause to the Local Plan Update. This decision will therefore, also pause any further work on Phase 2 of the ATM. Once the Council's parameters for the Local Plan update are known, the next stage can recommence by agreeing a brief for the work (this will include the scope of the Local Plan update and the vision-based approach to new developments and generated travel demands, which the County Council is adopting through the new West Sussex Transport Plan).

### **Conclusions**

- 1.13 The budget for Phase 2 of the ATM has been approved for commissioning in 2023. However, until the pause to the Local Plan Update is lifted, the next phase of the work cannot be commenced. This can only take place when the pause is lifted and the visioning and scoping the Local Plan has been agreed by the Council. Section 1.6 to 1.8 sets out contingencies for ensuring the ATM base model can be kept up to date in the interim period, through periodic validation. Nevertheless, it must be noted, that if the pause is prolonged into the longer term, these measures will be insufficient and a new ATM model will have to be commissioned, with the potential cost signalled in section 1.5 above.
- 1.14 Further progress reports will be put before the Planning Policy Committee in 2023.

### **1. PROPOSAL(S):**

That the A259 Local Model Validation report work be banked as evidence to support the Phase 2 of ATM model development, when the pause to the Local Plan Updated is lifted.

<b>2. OPTIONS:</b>		
To note progress on Stage 1 of the district-wide ATM and agree the A259 LMVR report be uploaded as evidence to the Local Plan web pages.		
<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		x
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial	x	
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x
<b>6. IMPLICATIONS:</b>		
The development of an Arun Transport Model incurs significant costs although a scaled up ATM using the A259 Transport Model is a cost-effective way of procuring robust evidence to support the update of the Arun Local Plan (when this resumes) and any transport mitigation required to support development. Appropriate budget provision has been made to enable this.		

<b>7. REASON FOR THE DECISION:</b>
To ensure that the future update to the Arun Local Plan is supported by a robust transport infrastructure and mitigation evidence when the Local Plan update resumes.

<b>8. BACKGROUND PAPERS:</b>
Background Paper 1 :23 February 2021 Planning Policy Sub-Committee - Item 6. Arun Local Plan Update – Evidence Base:- <a href="https://democracy.arun.gov.uk/ieListDocuments.aspx?CId=182&amp;MId=1329">https://democracy.arun.gov.uk/ieListDocuments.aspx?CId=182&amp;MId=1329</a>
Background Paper 2 : Arun ATM - A259 LMVR Report <a href="https://www.arun.gov.uk/transport-planning-policy">https://www.arun.gov.uk/transport-planning-policy</a>

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 27 JULY 2022

#### REPORT

**SUBJECT: Transport for the South East Strategic Investment Plan Consultation**

**REPORT AUTHOR:** Martyn White, Principal Planning Officer Policy and Conservation

**DATE:** June 2022

**EXTN:** x37857

**AREA:** Planning

#### EXECUTIVE SUMMARY:

Transport for the South East (TfSE) are undertaking a public consultation on a Strategic Investment Plan (SIP) with a vision to 2050. The £45 billion Strategic Investment Plan will provide a framework for delivering sustainable, integrated transport investment, levelling up, housing and economic growth, carbon reduction and adaption to climate change. The headline topics and issues officers identify will be contained in the Council's draft response, which will be circulated before the meeting.

#### RECOMMENDATIONS:

That the Planning Policy Committee consider and endorse the proposed consultation response to the Transport for the South East Strategic Investment Plan.

#### 1. BACKGROUND:

1.1 Transport for the South East (TfSE) is the Sub-national Transport Body for the South East of England which was established in 2017 to determine what transport infrastructure is needed to boost the region's economy. The role is to add strategic value to local and national decision making and project delivery by making sure funding and strategy decisions about transport in the South East are informed by local knowledge and priorities. As a partnership, they also ensure there is close alignment – a 'golden thread' – between local and national government in both the development of relevant policy and delivery of projects. For example, between local transport plans and national rail investment strategies.

1.2 A draft Strategic Investment Plan (SIP) for South East England has been prepared and published for consultation (20 June - 12 September). The SIP describes the framework required for delivering TfSE's vision and objectives to achieve a modern, integrated and sustainable transport network for the South East. It provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions in the coming three decades. It sets out where, when and under what conditions, packages of schemes, interventions and wider policy

initiatives should be implemented to achieve the vision for 2050.

### **Packages of Interventions**

- 1.3 TfSE has worked with partners, stakeholders and technical advisors to develop 24 packages of investment opportunities across the key modes or infrastructure networks of rail, mass transit (e.g., buses, ferries), active travel (e.g., walking, cycling horse-riding) and highways. Within each package are a collection of interventions that seek to address the key investment priorities for the South East and, in doing so, support wider local, regional and national policy and priorities. The packages broadly split into two groups.
- 1.4 **GROUP 1: Global policy interventions** – This consists of what the SIP describes as “national regulatory and policy activity and local action”. These are designed to address the challenges and opportunities that affect the whole of the South East and the wider UK and include existential challenges such as global warming and opportunities such as new mobility technologies. The key global policy interventions that would help deliver the investment priorities of the South East are:
- **Decarbonisation:** aspire to deliver a faster trajectory towards net-zero than current trends, including rapid adoption of zero emission technologies, to avoid the worst effects of human-induced climate change.
  - **Public Transport Fares:** A wish to reverse the real terms increase in the cost of public transport compared to motoring.
  - **New Mobility:** To see great potential for new mobility (e.g. electric bikes and scooters) to boost active travel in the South East.
  - **Road User Charging:** To 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 have shown how virtual working 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.
- 1.5 **GROUP 2:** This consists of twenty-four place-based packages of interventions presented at a sub-regional level, with many being multimodal or mode-agnostic. The two sub-regional areas of relevance for this authority are: Solent and Sussex Coast & London to Sussex Coast. These two sub-regional areas shall be discussed further below.
- 1.6 **Solent and Sussex Coast** - The Solent and Sussex Coast area includes the two largest conurbations in the South East – South Hampshire (Southampton, Portsmouth and surrounding built-up areas) and what TfSE terms the “Sussex Coast Conurbation” (Littlehampton – Worthing – Brighton). It spans from the New Forest in the west to Hastings in the east. It also includes the Isle of Wight. TfSE has developed nine packages of interventions for this area with a total expected capital investment of £11.8 billion by 2050. Of relevance to this authority are:



- **Sussex Coast Rail:** Network Rail has worked with Local Transport Authorities to develop a package of improvements in the West Coastway Strategic Study. This will support faster inter-urban and long-distance journeys between Brighton & Hove and Southampton. Two other key benefits of this package are potentially more frequent longer distance services and additional capacity between Worthing and Brighton for shorter journeys. The result would be 10,000 additional rail trips each weekday.
- *Sussex Coast Active Travel:* All three Local Transport Authorities on the Sussex Coast have ambitious plans to improve cycling and walking in their areas, and this package aims to help these authorities realise this ambition. It is noted that the SIP identifies that several smaller scale highways interventions are also included to support housing growth along the Sussex Coast. Most of these interventions include public transport and active travel elements.

A separate study has been commissioned by this authority and already presented to members on 1 June 2021 (Arun Local Plan Update – Active Travel Study). This study identifies an approach to improve active travel networks in the district, connect missing links and make links where there is an identified deficit.

- *Solent and Sussex Coast Highways:* the consultation document identifies that this consists of targeted interventions to deliver high-quality east – west connections, with the greatest benefit being when supporting, and supported by, public transport improvements.

These interventions will include those that deliver safer highways, notably in urban areas, and support access to international gateways, housing/regeneration/growth areas, and placemaking (e.g. unlocking public spaces). This package has been refined to minimise carbon emissions and the impact of these interventions on the wider environment. A point of note is that the SIP identifies that they aim to deliver modest improvements to the Strategic Road Network (SRN) that focus on segregating strategic and regional traffic rather than materially lifting capacity along the whole corridor. Further mitigation will be needed as these schemes are developed, and they will also be complimented by the Global Policy interventions, which will accelerate the decarbonisation of road vehicles and mitigate the adverse impacts of this package. The interventions for this authority to note are:

*National Highways led interventions on the Strategic Road Network: Existing and committed programmes:*

- I3 A27 Arundel Bypass – Identified as part of the Road Investment Strategy 2 schemes
- I8 A27 Chichester Improvements - identified as part of the Road Investment Strategy 3 Pipeline schemes
- I14 A259 Bognor Regis to Littlehampton Enhancement – identified as part of the Major Road Network (MRN) Schemes
- I16 A259 Chichester to Bognor Regis Enhancement– identified as part of

## the Major Road Network (MRN) Pipeline

The Bognor Regis to Littlehampton Enhancement works are a West Sussex County Council (WSCC) project bid to the Department for Transport (Dft) in the form of a business case and will accrue a percentage of developer funding. The proposed highways improvements have already been identified through a separate consultation which was organised by the County Council, and for which a committee report has already been presented to this committee (June 2021).

### *Place based packages of interventions:*

- I20 A27 Tangmere Junction Enhancements – pre-strategic outline business case. A feasibility study is required next
- I21 A27 Fontwell Junction Enhancements – pre-strategic outline business case. A feasibility study is required next
- I22 A27 Worthing (Long Term Solution) – pre-strategic outline business case. A feasibility study is required next
- I18 A29 Realignment including combined Cycleway and Footway – at Full Business case stage, with ongoing delivery identified as the next stage
- *Sussex Coast Mass Transit:* the SIP states that such a system would deliver a “world class” mass transit system with significant mode shift from car to bus services and provide an attractive and sustainable option for east – west local journeys along the South East coast. Such an approach would also reduce carbon and potentially boost GVA by over £100m each year. It would be based on a public transport system currently being developed for Brighton Seafront. The details of that system are to be finalised, but the topology of the city lends itself strongly to bus rapid transit (e.g., more frequent “turn up and go” and faster services on dedicated bus lanes and other priority infrastructure). The consultation document identifies that TfSE and its partners have carefully considered whether this system could also serve East and West Sussex, and that at this stage, extending to East Sussex appears to be more feasible than West Sussex. However, it is considered that this proposal is still worthy of note here.

1.7 London to Sussex Coast - The London to Sussex Coast area covers the key corridors between London and the Sussex Coast conurbation (from Chichester to Eastbourne). It focusses on interventions in East Surrey, West Sussex and East Sussex (excluding the Hastings area). TfSE has developed five packages of interventions for this area with a total expected capital investment of £3.6 billion and £0.6 billion in additional economic value each year by 2050. The interventions to note are:

- London – Sussex Coast Mass Transit: This package builds on the success of the Fastway bus rapid transit system in Crawley/Gatwick and will be supported by improvements to local buses and Strategic Mobility Hubs at Falmer and Three Bridges. It is identified that the interventions in this package will bring significant modal shift from car to bus through better interchange and journey experiences with improvements in the speed, frequency and connectivity of

mass transit services. The consultation document identifies “L12 A29 Corridor Rural Bus Service Enhancements”.

- London – Sussex Coast Rail: This package addresses key bottlenecks on the Brighton Main Line, enabling faster, more reliable services and increases in decarbonised capacity across rail operations in the region. Of note for Arun is reference to “J5 Arun Valley Line - Faster Services”.
- London – Sussex Coast Active Travel: This package expands on current ambitious plans by all four Local Transport Authorities in the area to improve cycling and walking by delivering improvements to the National Cycle Network routes and continued rollout of regional cycleways with consistent branding and wayfinding. Of note to Arun is a reference to “M10 West Sussex Inter-Urban Cycleways”.

### **Funding & Financing**

- 1.8 The SIP’s principal financial challenge will relate to funding both in terms of capital (for construction, maintenance and renewals) and resource (for operations). It should also be noted that TfSE is not a delivery body with revenue raising and borrowing powers.
- 1.9 The SIP identifies that the continued existence of a centralised funding regime for most types of strategic connectivity interventions suggests that many of the programmes will continue to be funded, at least in part, from what it describes as central sources.

### **Delivery**

- 1.10 TfSE will work closely with partners to deliver the packages of interventions. No single organisation will be solely responsible for delivering this plan – its delivery is very much a shared endeavour with the following key agencies that the SIP expects to be involved: Central Government, Network Rail and Great British Railways, National Highways, Local Transport Authorities, private sector and third parties, and Local Planning Authorities.

### **Timing and phasing**

- 1.11 In general, the vast majority of interventions included in the packages will be delivered through existing frameworks and investment cycles, in line with the Treasury Green Book and Department for Transport’s appraisal guidance.
- 1.12 A small number of particularly complex and/or large-scale interventions may require bespoke procurement and delivery arrangements. The SIP identifies those lessons should be captured from similar UK projects (e.g., Crossrail, HS2 etc.) to inform the approach for the delivery of these types of projects.

<b>Consultation</b>		
1.13 A period of consultation is currently running on the draft of the plan from 20 June to 12 September and everyone that it affects is able to read the draft and respond.		
1.14 Due to the short amount of time between the commencement of the consultation and the committee deadline for submitting reports, the draft consultation response for Arun will be circulated separately before the meeting. Links to the consultation documents are available below. A copy of the draft response will also be placed on the relevant council web pages.		
<b>1. PROPOSAL(S):</b>		
That the consultation response to the Transport for the South East Strategic Investment Plan is agreed.		
<b>2. OPTIONS:</b>		
Two options are noted:		
1 To approve the consultation response as drafted		
2 Not to approve the consultation response as drafted.		
<b>4. CONSULTATION:</b>		
Has consultation been undertaken with:	<b>YES</b>	<b>NO</b>
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify) Chairman and vice Chairman of Planning Policy Committee.	x	
<b>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</b>	<b>YES</b>	<b>NO</b>
Financial		x
Legal		x
Human Rights/Equality Impact Assessment		x
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land		x
Technology		x
Other (please explain)		X

## **6. IMPLICATIONS:**

The consultation response allows the District Council to partake in a formal period of consultation organised by Transport for South East. The results of the consultation will help to shape the final version of the Strategic Investment Plan, the contents of which will impact upon the transport infrastructure in this administrative area.

## **7. REASON FOR THE DECISION:**

To ensure that the council provides a response to Transport for South East on their Strategic Investment Plan, the contents of which include proposals which cover the Arun Local Planning Authority Area.

## **8. BACKGROUND PAPERS:**

### Consultation documents

A Strategic Investment Plan for the South East (main consultation draft) – accessible via [TfSE-consultation-draft-full-SIP-Jun-22.pdf](https://transportforthesoutheast.org.uk/TfSE-consultation-draft-full-SIP-Jun-22.pdf) ([transportforthesoutheast.org.uk](https://transportforthesoutheast.org.uk))

SIP FAQs and key messages - accessible via [SIP-FAQs-and-key-messages-May-22.pdf](https://transportforthesoutheast.org.uk/SIP-FAQs-and-key-messages-May-22.pdf) ([transportforthesoutheast.org.uk](https://transportforthesoutheast.org.uk))

Strategic Investment Plan evidence base) – accessible via [DRAFT Strategic Investment Plan for the South East - Transport for the South East](#)

### Other reports/ documents identified within the committee report

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 20 JULY 2021:  
A259 Corridor Improvements Consultation – accessible via [AGENDA ITEM NO](#) ([arun.gov.uk](https://arun.gov.uk))

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 1 JUNE 2021:  
Arun Local Plan Update – Active Travel Study – accessible via [AGENDA ITEM NO](#) ([arun.gov.uk](https://arun.gov.uk))

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 27 JULY 2022

#### REPORT

**SUBJECT: Gypsy & Traveller Development Plan Document Update**

**REPORT AUTHOR:** Donna Moles, Principal Planning Officer  
**DATE:** 16 June 2022  
**EXTN:** x 37697  
**AREA:** Planning

#### EXECUTIVE SUMMARY:

This report updates members on progress to resolve objections from West Sussex County Council in relation to proposed sites for intensification identified in the Regulation 18 consultation Gypsy & Traveller Development Plan Document (G&T DPD) and the next steps needed to deliver a Regulation 19 publication G&T DPD.

#### RECOMMENDATIONS:

That the Planning Policy Committee agrees:

1. That officers progress with the commission of The Gypsy Sites Deliverability Study 2022 in order to resolve the delivery of sites and the objection to a preferred location based on potential flooding.
2. That officers continue to undertake further 'duty to cooperate' discussions with West Sussex County Council and to update the joint Statement of Common Ground in this regard, published on the Council's web site.
3. That officers proceed with progressing the Gypsy & Traveller and Traveller Showperson Development Plan Document to Regulation 19 publication in Spring 2023, followed by submission in the Summer 2023 and subsequent examination in Winter 2023.

#### 1. BACKGROUND:

- 1.1 On 22 September 2020, the Planning Policy Sub-Committee agreed that the Regulation 18 Draft Gypsy & Traveller and Traveller Showperson Site Allocation Preferred Options Development Plan Document (G&TPODPD) should commence to public consultation in October 2020 for 8 weeks. The consultation commenced on 1 October 2020 and closed on 26 November 2020.
- 1.2 Following the Issues and Options public consultation period, on 15 December 2020 Planning Policy Sub-Committee (PPSC) noted the 'Statement of Representations', and proposed response to comments made concerning the

consultation draft G&TPODPD.

- 1.3 The key evidence studies (consulted on at Issues and Options stage) identified a need for 9 permanent Gypsy & Traveller (G&T) pitches and 14 permanent Traveller Showperson (TSP) plots to be accommodated within Arun over the plan period (from 2018 to 2036).
- 1.4 National Policy (NPPF 2021) states that a DPD needs to set out specific deliverable sites to meet identified needs within the first 5 years, developable sites 6-10 and or broad locations for years 11-15. Allowing for unimplemented consents or those being implemented, there is a consequent residual need for the G&T DPD to allocate 1 deliverable permanent pitch and 3 deliverable permanent plots within the first 5 years.
- 1.5 The proposed approach within with the G&TPODPD consultation and the supporting evidence studies is meeting need through intensification or expansion on 8 existing sites. An additional option included an area of search or broad location, for the only new potential Showperson plot at Little Meadow, Yapton (ARU-HELAA-46b). this would address a potential unmet need of 1 traveller showmen plot towards the end of the plan period and offer a degree of contingency and flexibility, should delivery not progress in accordance with the plan accommodation requirements.
- 1.6 The sites identified for intensification are set out in Appendix 1.
- 1.7 The draft 'G&TPODPD accordingly sets out three separate policies with a Policies map (Background Paper 2) and inset maps (Background paper 3) for each site over the firsts five years and remaining plan period. Policy criteria are proposed for delivery criteria and to mitigate impacts: -
  - Policy G&T SP1 Safeguarding Existing Gypsy Traveller and Traveller Showpeople sites'
  - Policy G&T SP2 Provision for Pitches and Plots
  - Policy G&T DM1 Site Delivery Criteria
- 1.8 None of the matters raised during the consultation are considered to be fundamental barriers to progressing the proposed safeguarding and intensification sites but will need ongoing engagement on the technical solutions and appropriate wording of associated development management policy.
- 1.9 The two main objections that materially exist and which discussions have been undertaken are-
  - The known issue about the status of one of the sites (i.e. whether ARU\_NS\_1 the Caravan Site is within the flood zone 3 and therefore, subject to sequential and exceptions test) this is a matter already identified by Environment Agency (EA) and West Sussex County Council (WSSCC) as Lead Local Flood Authority (LLFA) and programmed as needing resolution in the statement of common ground requiring further evidence/justification before the G&T DPD can progress;



- Landlord ownership restrictive covenants are now identified by WSCC to exist for:-
  - a. ARU049 Land at Limmer Road Stables
  - b. AL4717 Aldingbourne Farm Shop
  - c. ARU046 Nyton Stables

1.10 WSCC initially proposed that the resolution of this conflict would be to delete these proposed sites for intensification. However, this would pose a significant risk, given the evidence produced already, as any shortfall would result in a residual unmet need (for Gypsy & Traveller pitches but in particular traveller showmen plots) and consequently have to be explored with neighbouring authorities.

1.11 The 'Duty to Cooperate' requires a diligent 'no stone unturned approach and therefore, Arun District Council has engaged with WSCC extensively, to try resolve their objections in ways to allow the disputed sites to progress and encourage the landowners to negotiate the legal covenants with WSCC in a way which safeguards the purpose of the covenants and the interests of WSCC. WSCC have stated in principle, that they would be open to discussing any approach by the various owners subject to contract checking the legal restrictions and agreeing terms for lifting the covenants, including addressing any issues of land value uplift should they apply.

1.12 On this basis, officers at Arun District Council have written to both the landowners (as promoters of the sites for intensification) and WSCC, encouraging them to engage on the restrictive covenants and any potential breaches, to try to achieve solutions that ensure that WSCC interests are protected. WSCC has been advised that the work on the G&T DPD has therefore resumed including the commissioning of The Gypsy Sites Deliverability Study 2022.

1.13 The Gypsy Sites Deliverability Study 2022 will provide Arun District Council with robust evidence on the delivery of the preferred sites and broad location, addressing technical consultation comments raised concerning suitability, availability and achievability and matters set out in Statements of Common Ground with the key delivery, authority and agency stakeholders. The study will also resolve the objection on the flood status of one of the sites

1.14 The outputs of the study will then inform any necessary policy adjustment in order for a 'sound' Regulation 19 G&T DPD publication consultation stage to be undertaken.

### **Conclusion**

1.15 ADC has undertaken further extensive duty to cooperate negotiation on the ownership/covenant objection for the three disputed sites. It is considered by officers that these discussions have progressed sufficiently to allow the DPD to advance to the next stage after completion of the evidence study.

1.16 It is proposed that the Gypsy Site Deliverability Study 2022 therefore, be issued for commission on 29<sup>th</sup> July.

1.17 Following the Gypsy Site Deliverability Study 2022 outputs, the Regulation 19 stage G&T DPD publication consultation should then progress in spring 2023. (this will subsequently, need to be reported to this Committee as an amendment to the Council's Local Development Scheme at an appropriate date) with the preferred intensification sites and broad location which were consulted on at the Regulation 18 stage.

### 1.18 Next Steps

1.19 That a further update report on the evidence study is made to PPC on 24 November 2022 prior to progressing to G&TDPD to Regulation 19 publication stage.

## 2. PROPOSAL(S):

That The Gypsy Sites Deliverability Study 2022 will be commissioned to support the delivery of the sites and the Regulation 19 publication stage will proceed in Spring 2023.

## 3. OPTIONS:

Not to progress further work and report findings to members would be to risk preparation of a sound G&T DPD and would be contrary to national policy and policy commitment within the Adopted Arun Local Plan 2018 including the Local Development Scheme May 2020 (which will need to be updated) and therefore, risk planning by appeal and unplanned development.

## 4. CONSULTATION:

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		x
Relevant District Ward Councillors		x
Other groups/persons (please specify)		x
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial	x	
Legal	x	
Human Rights/Equality Impact Assessment	x	
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability		x
Asset Management/Property/Land		x
Technology		x
Other (please explain)		x

## **6. IMPLICATIONS:**

There are legal duties under the Equalities Act 2010 and in national planning policies and guidance to ensure that adequate deliverable and developable sites are provided to accommodate the needs of Gypsy and Traveller and Traveller Showpeople over the plan period that achieves sustainable development while ensuring that the amenity of the settled community are also accommodated.

## **7. REASON FOR THE DECISION:**

There is a policy requirement to progress a Gypsy and Traveller and Traveller Showmen Development Site Allocations Development Plan Document within the adopted Arun Local Plan 2018 and within the Council's Local Development Scheme 2020, in order to meet the objectively assessed needs for Gypsy and Traveller accommodation and therefore, provide a sound development plan for Arun District.

## **8. BACKGROUND PAPERS:**

The background papers 1-6 below may be accessed on the following 'Development Plan (including Local Plan)' web page, by navigating to the 'Gypsy & Traveller and Traveller Showpeople web tab:- <https://www.arun.gov.uk/gypsies-and-travellers/>

### **Background paper**

- 1 Draft G&T Preferred Options DPD
2. Draft G&T Policies Map (with Insets)
4. Draft G&T Inset Maps
4. Draft G&T Flood Zone Map
5. SA Technical Note G&TDPD
6. Statement of Representations

**Appendix 1: Table 1 : G&T Pitches and Plots to meet residual need respectively**

<b>Table 1 G&amp;T Pitches to meet residual need respectively</b>					
<b>Pitch Reference</b>	<b>Site Name</b>	<b>Existing &amp; unimplemented Pitches</b>	<b>Pitches 2018-23 (first 5 years)</b>	<b>Pitches 2023-36</b>	<b>Pitches 2018-36</b>
ARU031	Fieldview, Junction	3	0	0	
ARU049	Limmer Pond Stables	0	1	0	
ARU051	Dragonfly	0	0	1	
ARU_NS_1	The Caravan Site	1	0	1	
ARU044	2 Wyndham Acres	0	2	0	
<b>Need</b>			<b>1</b>	<b>4</b>	<b>9</b>
<b>Total Capacity</b>		<b>4</b>	<b>3</b>	<b>2</b>	<b>9</b>
<b>Balance</b>			<b>2</b>	<b>-2</b>	<b>0</b>

<b>Table 2 G&amp;T Plots to meet residual need respectively</b>					
<b>Plots Reference</b>	<b>Site Name</b>	<b>Existing &amp; unimplemented Plots</b>	<b>Plots 2018-23 (first 5 years)</b>	<b>Plots 2023-36</b>	<b>Plots 2018-36</b>
AL4714	Aldingbourne Farm Shop	4	4	0	8
ARU054	The Old Barns	1	0	1	2
ARU046	Nyton Stables	3	0	0	3
<b>Need</b>			<b>3</b>	<b>3</b>	<b>14</b>
<b>Total Capacity</b>		<b>8</b>	<b>4</b>	<b>1</b>	<b>13</b>
<b>Balance</b>			<b>1</b>	<b>-2</b>	<b>-1</b>

# Agenda Item 12

<b>Planning Policy Committee</b>	<b>Report Author</b>	<b>Date of Meeting</b>	<b>Full Council Meeting Date</b>
Karl Roberts, Neil Crowther			
Local Plan Evidence Update - Tourism & Visitor Accommodation Study	K Owen	<b>7 June 22</b>	13 July 22
Housing Delivery Test Update	K Owen		
Arun Local Plan Update – 6 month review	K Owen		
Arun Infrastructure Topic Papers - A27 junction Improvements; Wastewater Capacity; Water Neutrality; Housing Market Absorption	K Owen		
Transport for the Southeast Strategic Investment Plan Consultation	K Owen	<b>27 July 22</b>	14 Sep 22
Gypsy & Traveller Development Plan Document Update	K Owen		
The provision of resources to assist the Council on matters relating to the A27 Arundel Improvements	R Spencer		
Response to Southern Water's Drainage and Wastewater Management Plan (DWMP) consultation	K Owen		
Arun Transport Model Update	K Owen		
Planning Policy Work following Full Council on 13 July 2022	K Roberts/ N Crowther		
Arun Housing Market Absorption Study	K Owen	<b>21 Sept 22</b>	9 Nov 22
Arun Transport Apportionment Methodology Update	K Owen		
A response to the National Highways A27 Arundel further consultation	R Spencer		
Local Plan Evidence Update - Biodiversity Net Gain Study	K Owen		
		<b>24 Nov 22</b>	18 Jan 23
		<b>26 Jan 23</b>	15 Mar 23

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