

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 7 JUNE 2022

SUBJECT: Arun Infrastructure Topic Papers - A27 junction Improvements; Wastewater Capacity; Water Neutrality; Housing Market Absorption

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DATE: 13 May 2022
EXTN: 737857
PORTFOLIO AREA: Planning

EXECUTIVE SUMMARY:

This report provides the Committee with a progress update on the emergent infrastructure issues affecting plan making under the 'Duty to Cooperate', collated as a topic paper to be addressed as part of preparatory work to inform Arun's Local Plan update, when this resumes.

RECOMMENDATIONS:

The Committee is recommended to: -

1. Consider the progress made and outstanding matters in relation to the infrastructure topics; and
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'.

1. BACKGROUND:

- 1.1 The Planning Policy Committee (PPC) agreed in October 2021 (Background Paper 1) that the Arun Local Plan update be paused because of significant planning reforms signalled in the Planning Bill in 2021.
- 1.2 PPC also agreed that Topic Papers be prepared on a number of emergent infrastructure related issues identified under the 'Duty to Cooperate' with neighbouring authorities and infrastructure providers. The Topic Papers were to be worked up for inclusion in a report back to PPC within 6 months, when the matter of the Local Plan update resumption would be considered.

1.3 This report updates PPC on progress made in respect of the infrastructure subject matter of the topic papers (collated for this report for ease) to be covered which are:

- A27 junction improvements - implications of constrained capacity and viability;
- Wastewater Capacity & Water Quality;
- Water/Nutrient Neutrality;
- Non-Strategic Infrastructure;
- Housing Market Absorption Study.

A27 Junction Improvements

1.4 Chichester District Council (CDC) is preparing its Local Plan Regulation 19 Local Plan (Reg 19 LP) with a view to publication in the summer 2022.

1.5 The Regulation 18 Preferred Approach Chichester Local Plan consulted on in 2018:-

- Aimed to deliver 12,350 dwellings over 19 years (2016 - 2035) at 650 dwelling per annum (dpa)
- Included provision for 44 dpa unmet need towards South Downs Nation Park (SDNP)
- Was based on the 2018 Housing Employment Development Needs Assessment (HEDNA) which identified an Objectively Assessed Need based on the Standard Housing Methodology (SHM) of 609 dpa for the plan area (i.e., excluding SDNP) over 2016 - 2036
- Proposed distributing growth along an east - west corridor including the A259; within and around Chichester related to the A27 bypass and necessary junction mitigation; and to the south - Manhood Peninsular

1.6 To ensure a 15-year housing trajectory by the time of adoption, the Chichester Reg 19 LP will be rolled forward for the period over the 18 years 2021 - 2039. However, it is understood from Chichester officers and members, that because of evidence on significant cost and development viability constraints, delivering the full package of necessary A27 junction mitigation (including the Stockbridge southern relief road), in the Reg 19 LP is not achievable.

1.7 The Chichester Reg 19 LP may, therefore, adopt a constrained housing number significantly below the OAN but that the plan should be subject to early review on changed circumstances including the availability of Grant funding for A27 Improvements. The figures are draft and subject to change so cannot be reported here until they have been fully tested with latest emergent evidence, which is yet to be finalised and formally consulted on.

- 1.8 It is understood that the likely overall reduction in housing proposed, is more significant for the Western A259 corridor and the Manhood Peninsular, because the scale of housing is likely to be the same (or indeed there may be a marginal increase, including an additional potential employment land allocation) located around the Chichester A27 bypass Eastern corridor. This is significant for Arun because the Bognor Regis A27 junction and linked A259 corridor mutually serves the strategic developments both in Arun and in CDC in proximity, which are likely to have the most significant impact on the nearest roads and junctions serving them.
- 1.9 Under the Duty to Cooperate, Arun officers have and will continue to liaise with CDC informally and formerly on their emergent Reg 19 LP and supporting evidence. A Duty to Cooperate meeting was recently held with CDC together with the strategic highway authorities' (i.e., National Highways, West Sussex County Council) to explore the A27 junction and A259 mitigation and capacity issues. A number of questions and clarifications were requested on this matter (Appendix 1 Note of DtC Meeting). This meeting and the actions from it, will help to shape a Statement of Common Ground (ScG) with CDC on their plan preparation and also be used as the basis for Arun's own Local Plan update.
- 1.10 The key issues that Arun officers are pursuing relate to matters that may impact on the current delivery of the Arun Local Plan Strategic Allocations contributing towards the cross-boundary mitigation on the A27 as well as the basis for Arun's Local Plan update. In summary: -
- Does CDC transport modelling work looking at a constrained housing number and reduced A27 mitigation package, specifically address the cross-boundary implications for Arun?
 - Mitigation on the A259 appears to be missing from the Chichester IDP - does the transport modelling work based on the constrained housing distribution, indicate that cross boundary mitigation contributions are no longer needed on the A259 in Arun?
 - Have the Arun Strategic allocation cross boundary contributions towards the the A27 mitigations schemes been factored into the junction viability assessment? i.e., Bognor Regis Roundabout and Whyke Road Roundabout?
 - Has the scale of future growth to be planned for in Arun using the Standard Housing Methodology baseline figure (circa 8,000 dwellings) to be tested via the Local Plan update, been considered in Chichester's evidence regarding mitigation and viability assessment?

National Highways consider that the A27 capacity issues are matter for the respective Local Planning Authorities to resolve though plan making and evidence. Chichester District Council have undertaken to share evidence with Arun and to answer the queries raised via the transport modelling work at an appropriate point. Arun officers have been seeking meeting on these outcomes. However, Chichester officers do not yet appear to be in a position to respond. Therefore, a further report back to this committee will be necessary when the answers have been obtained later in the year. This will hopefully, provide a clearer picture on whether the A27 represents a significant constraint to housing growth required in any future ADC Local Plan update.

Wastewater Capacity 'Headroom'

- 1.11 Southern Water has been preparing a 'Drainage and Wastewater Management Plan' (DWMP) which has included some early engagement workshops with interested partners to review supporting evidence. For example, this engagement has provided baseline data on Wastewater Treatment Work (WwTW) infrastructure capacity, flood risk and water quality status. There has also been early discussion over potential approaches to investment going forward (with respect to the three catchments in Arun; Pagham, Lidsey and Ford WwTW). Southern Water aim to undertake a formal DWMP consultation in the summer 2022 with a view to publishing the final DWMP in spring 2023.
- 1.12 On 6 October 2021, PPC considered a report on the Council's proposed draft letter response (26 October) to the early DWMP consultation. Following discussion this was agreed with further points and clarification comments from the Committee and sent to Southern Water.
- 1.13 In October 2021 Arun (Environment & Housing Services) wrote to Southern Water on the matter of storm related 'spill' via Combined Sewer Outfall (CSO) affecting Arun bathing water. Consented CSO spill plays a critical role in preventing health risks and the flooding of residential and commercial buildings. However, rapid growth in population, and the impact of climate change (e.g., increased rainfall and ground water) have added significant pressure to the sewer network and exacerbated the CSO spill issue.
- 1.14 Southern Water's response to the letter included reference to the design standards for most of the Arun sewerage system now being too small. Southern Water also referred to their DWMP work to identify the issues and investment response. Evidence showed that up to 97% of the flow in the sewers arriving at the treatment plants during a storm, tends to be rainwater. There are 2 approaches to dealing with this, upsizing the vast network (e.g., over 400km in one system) or reducing the flow into the systems.
- 1.15 The most efficient, cost effective and environmentally beneficial way to reduce/eliminate storm releases is to reduce the amount of surface water connected to the sewer system. The primary component is road/roof drainage where only a 40% reduction in flow to the combined sewer would mean that the CSOs release rate would reduce by 80%. In addition, building only water efficient housing with SuDs (and outside of the scope of planning - retrofitting of existing housing stock to be more water efficient) is also important. As part of the DWMP engagement work, Southern Water are also looking at scope for separating the flows through underground storage where feasible including expanding capacity for the systems in Arun, as part of the DWMP summer consultation and the capital investment programme Asset Management Plan (AMP).
- 1.16 The Environment Act 2021 has now brought in a new requirement for sewerage undertakers to report yearly on their achievements towards reducing storm spill discharges. Southern Water have set up a taskforce and are committed to seek ways to cut these spill incidences by 80% by 2030.

- 1.17 In November 2021 Arun officers met with Southern Water to validate the housing assumptions used in Southern Water's wastewater capacity planning. Southern Water undertake a quarterly Development Assessment to establish their capacity planning. The reported development data schedule is based on the Council's published Authority Monitoring Report, and it is shared with Southern Water asset planners to use, alongside associated population forecasts, to plan future investment in wastewater treatment / water supply. Generally, this excludes sites less than 10 dwellings as the purpose of the data is to get an idea of longer-term growth, and an additional 10% is generally allowed for smaller sites.
- 1.18 This schedule of housing developments is supplemented by a 'growth tracker spreadsheet'. The 'growth tracker spreadsheet' is used by Southern Water to log planning applications consulted on, which have been assessed as requiring a 'growth scheme', i.e., network reinforcements to accommodate the development within the existing network. This will contain any sites that have been consulted on by Arun DM officers and Southern Water's response letter, where stating that network reinforcement will be required. Sites will stay on the growth tracker until their reinforcement projects are complete.
- 1.19 Arun officers have supplemented the data on recent planning applications to ensure that Southern Water are taking account potentially accelerated housing development and yields arising within Strategic Allocations e.g., Barnham Eastergate/Westergate to calculate wastewater capacity 'headroom'. Southern Water intend to add the data to the quarterly Development Assessment April - June update and so will be able to provide an update on the WwTW 'headroom' until after that round of updates and outputs. Officers will report any outputs at the next appropriate meeting.
- 1.20 Southern Water have further clarified the fundamentals to their approach to planning WwTW capacity 'headroom'. From Southern Water's perspective, wastewater treatment capacity is not a constraint to future growth. The utility has recently published a 'Wastewater Position Statement 2022' to this effect (see Background Paper 4).
- 1.21 However, in order to ensure that all aspects of this subject have been addressed comprehensively, for example, should the Environment Agency (Southern Water's environmental regulator) identify any environmental constraints that would potentially constrain future growth, Southern Water advise Arun District Council to consider, preparing a 'Water Cycle Study' to help identify these. A Water Cycle Strategy (WCS) identifies tensions between planned growth proposals and the water related environmental standards to be maintained or enhanced through infrastructure and other actions. A WCS may provide details of water efficiency; wastewater treatment; environmental water quality; water resources; water supply; wastewater drainage; as well as the ecological constraints and opportunities relating to these aspects of the water cycle. Such a study would depend on testing the known housing and development numbers and would therefore, necessarily, only be commissioned after work to establishing the level of growth to be accommodated in the Local Plan update (when that resumes).

- 1.22 Arun officers will also continue to engage with southern Water on developing their DWMP and also set out matters in a Statement of Common Ground with Southern Water and the Environment Agency on this topic. This will help to ensure transparency on responsibilities, evidence and areas of agreement (and disagreement) or outstanding areas requiring further work, to ensure that matters are resolved early in the Local Plan update (when it resumes).

Nutrient Neutrality

- 1.23 A number of plan making authorities across the UK and in areas close to Arun, (e.g. Chichester, Havant, Portsmouth) are facing difficulties in plan preparation arising from the challenge of ensuring that the impacts arising from development do not add to certain nutrient concentrations, impacting on wastewater treatment catchments which contain sensitive environmental habitats and ecosystems, that are protected by EU (Habitats Directive) and UK law (internationally important sites protected under the Conservation of Habitats and Species Regulations 2017).
- 1.24 All developments potentially impact on the level of water nutrients (e.g., housing or commercial related) through foul and grey wastewater, including surface water (e.g., in combined sewers or where there is penetration into the sewer network) which gives rise to soluble nutrients such as nitrates, phosphorus and other chemical compounds which must be treated, before water is discharged into water courses and the environment. Farming and agriculture can also have a significant impact through the use of Agri-chemicals and fertilisers and together these sources can lead to 'eutrophication' resulting for example, from algal blooms, where oxygen is depleted, seriously damaging ecosystems and aquatic plants and animals. Where protected European habitats are impacted, this is a breach of EU and UK law.
- 1.25 Natural England (NE) has previously advised 32 LPAs that, where protected sites are in unfavourable condition due to excess nutrients, development should only go ahead if it will not cause additional pollution to sites. In March 2022, Natural England advised a further 42 Local Planning Authorities that their areas are covered by this advice (Background Paper 2). Arun is not currently within this list, although is surrounded by a number of immediate neighbours.
- 1.26 The advice from Natural England means that new residential development must achieve 'nutrient neutrality'. It has had a significant negative impact on the number of homes granted planning permission in areas already affected. As a result, the Government's response has currently been to provide a funding pot, and for NE to produce clear guidance working with DEFRA (e.g., to provide nutrient calculators), as well as offering individual support for those authorities affected.
- 1.27 This issue may become relevant to Arun's Local Plan Update going forward because Arun includes part of the Marine Conservation Zone, SSSI, Ramsar and SPA designations for the Pagham Harbour shared with Chichester District and therefore, both authorities have significant existing and planned development which individually and cumulatively, may impact on Pagham Harbour designations.

1.28 While Natural England (NE) have not signalled concern with nutrient neutrality impacting on Pagham Harbour, they have signalled an intent to assess Pagham Harbour in the near future. In the interim NE have undertaken and published in the public domain an initial report to identify data gaps: -

“The purpose of this report is to review the data available to assess the current condition of each of the qualifying features of Pagham Harbour SSSI, SPA, Ramsar, and MCZ sites, and outline any gaps in the data which make it not possible to make an assessment of their current condition. “

1.29 NE, therefore, plan to fill the data gaps this year and complete the condition assessment next year – but are still awaiting confirmation of budgets for the work. Officers have been seeking engagement with NE on the matter of Nitrate Neutrality but have so far been unsuccessful in securing a meeting. In the interim Officers will continue to engage with NE in order to set out a Statement of Common Ground which will support the emerging Local Plan update when this is resumed.

Water Neutrality

1.30 Water Neutrality is defined as development that takes place which does not increase the rate of water abstraction for drinking water supplies above existing levels – or put simply, total demand for water should be the same after new development is built, as it was before.

1.31 Water Neutrality has implications for the Development Plan policies and the determination of planning applications. Local Plan policies set out the quantity of development and its associated water efficiency through water efficiency standards set out in plan policies (which may be the same or above Building Regulations). Arun’s Local Plan Policy W DM1 ‘Water Supply and Water Quality’ sets out an efficiency standard of 110 litre /person/day. This can be achieved through developments fitting water saving spray taps, dual flush WC and other devices within dwellings, including rainwater harvesting and recycling grey water. Such measures can help to reduce the need for water abstraction and water treatment.

1.32 The need for significant water treatment mitigation and application of efficiency standards raises viability and deliverability constraints and increased potential intervention for plan making and decision making (i.e., determining planning applications).

1.33 Chichester, Horsham, Crawley and South Downs National Park authorities are affected by the Sussex North Water Resource Zone and levels of abstraction which potentially impact on sensitive receptors such as the Arun Valley Special Protection Area (SPA) and Special Area of Conservation (SAC) protected by European and UK law.

1.34 Consequently (and for other reasons), the Horsham Regulation 19 Proposed Submission Local Plan has been postponed following receipt of a ‘Position Statement’ (14 September 2021) from Natural England, the national statutory body that oversees the management of wildlife and habitats across the UK.

1.35 The 'Position Statement' (Background Paper 3) advises that development proposals, such as new homes and commercial buildings, in the Sussex North Water Supply Zone (NWZ) should not be allowed at present, unless water neutrality can be demonstrated. This is due to a potential significant impact on rare habitats in the Arun Valley, near Pulborough. Horsham District Council is unable to ensure a sound and legally compliant Local Plan until more is known about the impacts on the Arun Valley, and until a Water Neutrality Strategy for the area is developed.

1.36 Chichester District was similarly advised that for their area within the NWZ area, which is supplied by a water extraction at Hardham, it cannot with certainty, be concluded that it is not having an adverse impact on integrity on the Arun Valley SPA, SAC and Ramsar and consequently must be part of the Water Neutrality Strategy.

1.37 Water Neutrality is an issue also faced by authorities in the Hampshire sub-region because of impacts on the Solent. The Environment Agency is the water company regulator and classifies part of the wider South East region, including the eastern half of Arun District (served by Southern Water) as an area of 'Serious Water Stress'.

1.38 The Environment Agency's recently published advice: 'Environment Agency Solent and South Downs Area Water Efficiency Position Statement for Local Plans and Strategic Work' (see Background Paper 5) extract below: -

"In line with the National Framework we advise that "Regional groups [including water companies] should:

- *Contribute to a national ambition on average PCC of 110 l/p/d by 2050. This should be reviewed every 5 years*
- *Pursue ambitious reductions in non-household demand and contribute to the evidence available on the potential savings - as part of this regional groups should work with non-household water retailers and new appointments and variations (NAVs) to align their approaches to planning, reducing demand, forecasting and monitoring non-household water use.*

We will support policies which include aspirational targets that go beyond this."

1.39 The evidence in the position statement signals increased future stress arising from development and climate change. Consequently, while not currently an issue in Arun, given the need for future planning, at an appropriate time when the level of growth to be tested is known, officers will consider procuring a 'Water Cycle Study' to address water neutrality as part of the Local Plan update (when it resumes) to ensure that this issue does not become a barrier.

Non-Strategic Infrastructure

1.40 The Committee raised a number of concerns at the meeting on 15 October 2021 concerning the provision of necessary infrastructure to mitigate windfall and non-strategic developments (circa developments below 300 units) coming forward. The Local Plan 2018 evidence on transport modelling and mitigation infrastructure includes specific modelling for the Strategic Allocations but for everything else to be

included in TEMPro background growth as development that would occur through applications with or without a plan in place (i.e., providing a way for accounting for windfall, and the 1,250 dwellings yet to allocated within a Non-strategic Sites Development Plan Document (NDPD) or Neighbourhood Development Plans (NDP)).

- 1.41 However, the NDPD was not progressed to resource the decision of Full Council in January 2020 to progress the Local Plan Update. The evidence base for this would have considered the allocation of non-strategic developments, any necessary site-specific mitigation and their deliverability and viability. Neighbourhood Development Plans are similarly evidenced and consulted on with infrastructure providers and tested at examination.
- 1.42 In Arun, Strategic Allocations are zero rated for Community Infrastructure Levy (CIL) and mitigate their impacts through s.106 contributions (on and off-site). Whereas non-strategic scale developments are outside of the Strategic Allocations and subject to CIL charging.
- 1.43 For CIL chargeable development therefore, CIL regulations 2019 scaled back the use of s.106 obligations to only address the need for onsite mitigation. Off-site infrastructure mitigation is funded by CIL revenue although CIL can also fund onsite infrastructure provided there is no double charging with s.106. Arun's CIL Viability Study update 2018 tested the viability of non-strategic sites (of 11 units or more where affordable housing obligations would arise) and determined that they would be able to sustain on average, a £2,000 contribution per dwelling for onsite planning obligations (not including the affordable housing contributions).
- 1.44 The acceptability of non-strategic development in planning terms should, therefore, reflect imposition of planning conditions, and use of limited onsite s.106 planning obligations (where necessary) and s.278 contributions, supported by CIL funded infrastructure. For transport and site access matters, the relevant providers e.g., West Sussex County Council or National Highways will be consulted on the application and developments must mitigate their transport impacts based on any accompanying Transport Statement (less than 50 dwellings) or Traffic Impact Assessment (80 plus dwellings). This is likely to be secured via imposition of planning conditions or s.278 highways contributions, related to access or highway improvements. Providers will object to developments if this is not the case.
- 1.45 To address members concerns about the cumulative windfall impact on strategic transport (and other forms of development mitigation) officers will continue to work with WSCC and other infrastructure providers as part of the CIL Infrastructure Investment Plan (IIP) preparation process via the joint member and officer liaison group to ensure that investment priorities and funding gaps can be addressed. In addition, the Local Plan Update will be able to commission necessary evidence on the mitigation, viability and deliverability of both strategic and non-strategic future planned development requirements. Officers will report back to this committee on these matters at appropriate opportunities.

Housing Market Absorption Study.

- 1.46 A Housing Market Absorption Study has been commissioned via Icen Projects Ltd. The consultants have extensive experience in analysing housing market data across the local authority sector and private sector. The terms of the study are to test the ability of the development industry to achieve completions and sales of their housing product in Arun, compared to the adopted Local Plan 2018 housing requirement and housing trajectory. In other words, this study is testing whether, even if the Council allocates land and grants permission for a substantial number of new dwellings within a specific period, would the housing market in Arun ever be able to deliver that quantum?
- 1.47 This will be assessed by looking at housing sales performance against the trajectory and including looking at comparable areas, known emerging macro-economic factors and localised delivery barriers, in order to predict housing delivery performance to establish a realistic maximum annualised rate of housing delivery that the market is capable of delivering.
- 1.48 The outputs of the study will be reported to PPC on 27 July 2022 following a member briefing on the interim progress on 6 June 2022.

Conclusions

- 1.49 Officers will continue to seek resolution on these infrastructure topics under the 'Duty to Cooperate' with infrastructure providers and adjacent plan making authorities. However, to ensure that Arun's plan making is transparent and meets national guidance, it is intended that the topic matters, where appropriate, be set out as Statements of Common Ground (ScG) with the relevant stakeholders and infrastructure providers. Under the 'Duty to cooperate' ScG must be published on the Council's web site before consultation is undertaken at Regulation 18 on a Draft Development Plan Document. This ensures that evidence and issues are identified and resolved as early as possible in the plan process (including areas of agreement or disagreement or those outstanding issues requiring further evidence and resolution). The 'Duty to Cooperate' and ScG will provide critical evidence informing the Arun Local Plan update (when this resumes).

3. PROPOSAL(S):

That the emergent work for the Topic Paper subjects is used for the Duty to Cooperate and evidence base preparation on infrastructure requirements to support the Local Plan update when it resumes, to ensure that the development of Arun and the impact on communities is sustainable and supported by necessary infrastructure.

4. OPTIONS:

To agree the report; or not to agree the report.

4. CONSULTATION:

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		x

Relevant District Ward Councillors		X
Other groups/persons (please specify) Chairman and vice Chairman of Planning Policy Committee.	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: The resumption of the Local Plan update will need to be supported by the technical evidence to support an appropriate level, and distribution of growth and necessary supporting infrastructure, to ensure that development is sustainable and mitigates the adverse impacts of growth.		

7. REASON FOR THE DECISION:

To ensure that the development of Arun and the impact on communities, is sustainable and supported by necessary infrastructure planning and provision.

8. BACKGROUND PAPERS:

Background paper 1: Item 10 Local Plan update 6 October 2021:-

<https://democracy.arun.gov.uk/ieListDocuments.aspx?CId=349&MId=1458>

Background Paper 2: Natural England Advice for Nutrient Neutrality:-

<https://naturalengland.blog.gov.uk/2022/03/18/creating-the-new-homes-and-the-healthy-natural-environment-we-need/>

Background Paper 3: Natural England Position Statement for Sussex Norther Water Supply Zone: -

[Position Statement](#)

Background Paper 4: Southern Water Wastewater Position Statement:-

<https://www.arun.gov.uk/duty-to-cooperate>

Background Paper 5: Environment Agency Solent and South Downs Area Water Efficiency
Position Statement for Local Plans and Strategic Work’:-

<https://www.arun.gov.uk/duty-to-cooperate>

**Appendix 1: Duty to Cooperate: Arun District Council Chichester District Council
Meeting with National highways and West Sussex County Council
Cross Boundary Transport Matters.**

Note of Meeting 31 March 2022

Attendees:

Arun District Council (ADC) <ul style="list-style-type: none">• Karl Roberts• Kevin Owen	National Highways (NH) <ul style="list-style-type: none">• Elizabeth Cleaver• David Bowie
Chichester District Council (CDC) <ul style="list-style-type: none">• Tony Witty• John Boardman	West Sussex County Council (WSCC) <ul style="list-style-type: none">• Darryl Hemmings• Tracey Flitcroft

1. Introductions/apologies: Neil Crowther and Caroline West

2. Purpose of the meeting – ADC

- ADC briefly explained the meeting was part of a process for preparing the ground for Arun's Local Plan update which is currently paused but may resume.
- The recent informal consultations on Chichester's Local Plan review (revised housing distribution) and Infrastructure Development Plan raised a number of cross boundary issues that need to be understood both in terms of current infrastructure delivery (in particular on junctions on the A27 and on the A259) but also in terms of the basis for the Arun Local Plan update when/if it resumes.
- It is important to capture these matters within a Statement of Common Ground as part of front-loading plan making and this meeting is starting this conversation.

3. ADC Local Plan Brief Update timescales/next steps

- Planning Policy Committee on 7 June 2022 would be considering the matter of the pause to the Local Plan update in the light that planning reforms may no longer be a significant risk and reason not to proceed.
- Arun's Standard Housing Methodology suggest potential 1,350 dwellings per annum (dpa - includes part for SDNP) compared to the current plan 1,000 dpa or some 8,000 additional dwellings to be accommodated in any plan update.

4. CDC Local Plan Brief Update timescales/next steps

- Chichester Members will be considering a Regulation 19 Local Plan in July and are keen to progress while tackling the difficulties in A27 capacity, viability and mitigation.
- Stantec (CDC transport consultants) are testing XXX dpa including phasing/mitigation and degree of development that could be safely accommodated in advance of improvements/contributions.
- Transport modelling is still being finalised and work is anticipated imminently on outputs for the north and south of the Chichester plan area which can be shared with Arun or when these work streams are brought together – the IDP therefore, will need to further reflect this and so is not finalised.

5. Transport Matters

- ADC Transport Model had included development assumptions to south and east of Chichester and A27 and similarly, the Chichester 'Preferred Approach' Local Plan Transport Model included assumptions about key developments in the West of Arun.
- ADC considered that the effect of CDC reduced housing distribution is more significant for the west and south and would therefore, be the same or marginally more significant (with additional housing and employment allocation) for the A27 Bognor Roundabout and other mutual junction dependencies south and east on A27.
- WSCC clarified that A27 Bognor Regis roundabout mitigation design for CDC was different to that for the ADC Local Plan but that the ADC design was now likely to be the template topped up by the CDC work. Similarly, the CDC Whyke roundabout signalise junction would not now happen but amended design would accommodate Pagham contribution.
- **Question:** does the Stantec modelling work justify and address the issues above (and in the Appendix 1 letter)? - and will it specifically address the cross-boundary implications for Arun?
- Mitigations and contributions are 'baked in' to both plan areas and viability assumptions with respect to the A27 although mitigation on the A259 appears to be missing from the Chichester IDP (Issues identified in the Appendix 1 ADC letter to CDC on the IDP for revised housing distribution).
- **Question:** does the CDC Transport modelling work, based on the revised housing distribution, indicate that cross boundary mitigation contributions are no longer needed on the A259 in Arun?
- **Question:** are Arun development mitigations contributions included the scheme viability work for Chichester (a set out in the Appendix 1 letter) and would that make any impact?
- WSCC considered that this would not resolve the overarching A27 mitigation/viability issue.

- **Question:** has the scale of future growth to be planned for in Arun (via the Local plan update) been considered regarding mitigation and viability?
 - WSCC clarified that the Stantec Transport Model would have only included Temprow growth factors outside of the plan area for future growth assumptions. It would be difficult to model future Arun growth without knowing where it was to be located and it would also generate its own infrastructure mitigation package
 - ADC asked specifically whether the CDC viability assessment used to justify why the required A27 works couldn't be funded by new development, had taken into account known development in Arun and then the potential for future housing growth in Arun (e.g., based on the Standard Housing Method) given the geography of constraints in Arun.
 - ADC considered that CDC justification to reduced housing numbers based on a constrained transport infrastructure capacity, would logically also apply to Arun with regard to the A27, to constrain future plan making in Arun because the A27 is critical to commuter movement in the centre and west of Arun.
 - NH would like to be kept in the loop – the Stantec work recognised that the network was over capacity – so it is down to the two plan making authorities to break the deadlock. The s.278 /s.106 contributions also allow NH a degree of flexibility with respect to the design solutions.
 - WSCC have also fed comments into CDC informal consultation with respect to sustainable transport and also the A259 corridor studies that need to feature in the CDC modelling work.
 - ADC offered that a note of the meeting would be circulated to clarify questions and actions for CDC to take back, before working up the Statements of Common Ground on the transport matters and issue and approach to ADC plan making (modelling, development viability etc).
 - CDC agreed that an ongoing DtC process on this was necessary and that diaries should be scoped – for efficiency ADC would suggest dates but also be willing to attend meetings as appropriate on CDC emergent transport evidence base.
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- **Action:** CDC would refer ADC's letter to Stantec to address the issues and clarifications sought by ADC in the letter.
 - **Action:** ADC would draft and circulate a note of the meeting, adding the additional points and questions arising from the discussion for CDC to put to Stantec to consider and to respond.
 - **Action:** CDC to respond to the informal consultation 'in the round' and as evidence is finalised as part of the CDC LP consultation stages
 - **Action:** ADC to set up diary requests for further meetings.

6. **AOB**

- ADC clarified will report A27 Topic Paper to next Planning Policy Committee 7 June 2022.