

ARUN LOCAL PLAN EXAMINATION - ADC Answers to Inspectors Questions following Interim Findings		ADCED89
INSPECTOR'S INTERIM FINDINGS FOLLOWING HEARING SESSIONS	Arun District Council Response	Will there be a (MM) or reference for Evidence
<b>Introduction</b>		
1. The purpose of this note is to provide preliminary findings on some key issues and my views on the further Main Modifications (MMs) that are likely to be required to make the Arun Local Plan (LP) sound following the hearing sessions. The MMs are in addition to those already raised in my preliminary and additional questions and those being considered by the Council as a result of the hearing sessions. In addition to possible MMs the note seeks clarification/further information from the Council on some matters following the hearings, particularly in relation to documentation that was submitted just before or during the hearings.	Noted	None
2. I would also advise that I will give full consideration to all the representations made about the LP including the oral contributions at the hearings. My final conclusions regarding soundness and procedural compliance will be set out in the report to be produced following consultation on the proposed MMs. Nevertheless, having regard to the criteria for soundness and to assist at this stage, I shall provide brief explanations for my findings thus far.	Noted	None
3. My findings may alter in the light of any further evidence that emerges including the consultation process. My views are therefore given here without prejudice to the conclusions that will appear in the report. My final report will also cover other main issues that arose during the examination but which are not dealt with in this note.	Noted	None
<b>Matter 1 – Procedural and Overarching Matters</b>		
<b>Duty to Cooperate</b>		
4. I have had regard to PELP27 – Duty to Cooperate (DtC) Statement Addendum April 2017 which details further engagement undertaken since the suspension of the examination, the Memoranda of Understanding submitted before and during the hearings and the other evidence provided by the Council e.g. the updated Local Strategic Statement (LSS2), the evidence gathering being undertaken for LSS3 and the production of the Arun Place Plan by West Sussex County Council. It would have been preferable for these strands of evidence to be set out in a composite document but this is not a significant consideration in whether or not the DtC has been met.	Noted	None
5. Other Councils are at different stages of plan preparation. Therefore, whilst the unmet development needs of Chichester are clear, the extent to which Worthing and Adur can meet their needs has not been decided. That said some unmet needs from those two Councils are likely to exist. In the context of the DtC the Council's acceptance that it should meet some of the unmet needs from elsewhere within the sub-region demonstrates effective cooperation. Moreover, the LP is being examined at a point in time and the DtC evidence can only reflect that. Engagement will be ongoing.	Noted	None
6. I am satisfied that the Council has engaged constructively and complied with the Duty to Cooperate.	Noted	None
<b>Consultation</b>		
7. There has been criticism of the Council's approach to consultation, particularly in relation to engaging with local communities and residents on the significant modifications proposed following the suspension of the examination in February 2016. However, the Council has met the requirements in the regulations <sup>1</sup> relating to publication of the modified Plan over a 6 week period, seeking and considering representations and submitting documents to the Secretary of State (SoS). It is beyond the scope of the examination to require that the Council go back and do more.	Noted	

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<b>Matter 2 - The Strategic Approach, Settlement Structure and Green Infrastructure</b>		
<b>Gaps between Settlements</b>		
<p>8. There was discussion about the Angmering/Worthing Gap at Hearing Session 2. The Council's statement referred to the Hankinson Duckett Associates report (PESP3) as evidence to support the gaps. However, PESP3 did not refer to this particular gap. The Landscape Capacity Study refers to 'separation between settlements' in its annotations but does not appear to specifically analyse the significance of this or other gaps. Reference was made to a committee meeting of 28 November 2013 (ADCED62). Section 2 of the Background Paper attached to the meeting's agenda provides some explanation as to why the gap was designated in the LP. <b><i>Is this the extent of the evidence to support this particular gap?</i></b></p>	<p>The background paper provides the evidence to support the Councils approach to identifying and designating the gap. This is based on the contents of the Landscape and Visual Amenity Aspects of Development Choice report (PESP3) which assess the sensitivity and capacity of the landscape to accommodate change/development. In addition, the study assessed the Strategic and Local Gaps identified within the 2003 Local Plan to test the extent to which they fulfilled their policy function. This was based on a landscape structural analysis, landscape characterisation and visual analysis. Further Information is contained within Chapter 6 of the study. PESP3 does not assess the new gap, however it identifies that the area has a low / medium landscape capacity. Likewise, the Landscape Capacity Study (PESP5a,b,c,d,e) relates only to those strategic allocations to be considered as part of the Local Plan. The Local Plan Sub-Committee report (ADCED62) support the decision to identify the area of land identified as the Angmering/Worthing Gap. This decision was endorsed by the Council. These evidence documents referred to, collectively justify and support the designation of the gap.</p>	None
<p>9. Even without the gap protection the land to the north of the A259 forms part of the setting to the South Downs National Park (SDNP) and Highdown Hill in particular and as such would be protected by other policies of the LP. Moreover, the gap has been compromised by development around Hangleton. <b><i>In these respects the Council should review whether the Angmering/Worthing Gap is justified and, if it can be supported, whether the extent of it should be revised.</i></b></p>	<p>These points are noted. It is important to emphasise that this policy approach is not intended to protect the Countryside or Landscape (which have their own policies), but rather as a planning tool designed to shape the patterns of towns and villages within the District. Arun has a distinctive landscape pattern including that found around Greater Littlehampton Urban Area and Angmering. Whilst there is some development within the new gap, the majority of this is considered to be related to agriculture, leisure and countryside based activities. Such uses are considered to be appropriate for the gap designation. As a consequence, the Council considers that the gap should remain as drawn on the policies map, and that no modification is required to the policy.</p>	None
<p>10. The Felpham/Bognor Regis Gap does not appear to meet the objective of Policy SD SP3 to 'shape the patterns of towns and villages with the District' (paragraph 7.4.4). Felpham forms part of the Greater Bognor Regis Urban Area. Moreover, the gap is already narrow and would be further compromised by Site 4 of Enterprise Bognor Regis (EBR) and the Link Road. The gap policy may make it more difficult to deliver Site 4 and the Link Road. <b><i>The Council should give further consideration as to whether the Felpham/Bognor Regis Gap is justified.</i></b></p>	<p>The Felpham/Bognor Regis Gap has been assessed as part of the Arun Landscape Study (PESP3). The report identifies that the gap transects and separates two urban areas within the Greater Bognor Regis Urban Area. It also notes that it lies on low lying ground within the flood zone flanked by coastal plateau to the east and west and by the residential suburbs of Felpham and Bersted respectively. The gap includes a number of uses including arable and pastoral agricultural land, playing fields and a golf course. These uses combine to provide visual and physical separation between residential areas. The gap allows distant open views of the South Downs and connects central Bognor Regis with the wider countryside. Whilst the boundary of the gap has been amended to accommodate site four of Enterprise Bognor Regis (EBR), and the route of the link road (which runs through the gap) has been safeguarded, it is considered that such development would not materially affect the gap with sensitive design. As a consequence, the argument is made for the gap to be retained. In summary no modification is considered necessary to either the policy (SD SP3) or the policies map.</p>	None

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<b>Matter 3b – Employment Allocations</b>		
<b>Enterprise Bognor Regis</b>		
<p>11. The Council indicated that a written note would be produced on Bognor Regis Golf Course in the context of ongoing discussions and the content of Policy EMP DM2. <b><i>Is this available?</i></b> There appear to be issues around the delivery of the link road. <b><i>In this context should the extent of the EBR Site 4 be modified? Is criterion 'L' within Policy EMP DM2 (residential use not appropriate) too restrictive? Should the policy include other mechanisms which would support comprehensive planning and development of the area around the link road?</i></b></p>	<p>The Note on Bognor Regis Golf Course is available. The criterion states 'Class C3 Residential use will not be considered appropriate'. The policy is concerned with employment and enterprise, focusing specifically at Enterprise Bognor Regis. Whilst the council considers that a mix of uses is acceptable in employment locations, including C1 (halls of residence for workers and students) it does not support the use of C3 residential.</p> <p>It is therefore considered that the criterion is required.</p> <p>The extent of EBR site 4 will not be modified as the amount of actual floorspace that should be developed is set out in table 8.3. The exact location will depend upon more detail related to flooding and access becoming available. Comprehensive development of the area around the link road can be properly considered as part of the Non-Strategic Sites DPD.</p>	See Bognor Regis Golf Club note PEPP10
<b>Angmering</b>		
<p>12. The 8 ha allocation at Angmering would provide the largest site in the eastern part of the District, close to Worthing, and flexibility in the supply of employment land. However, the LP employment allocations through Policy EMP SP3 are significantly above the quantified need for the District as a whole. The Council's studies, which are endorsed by work carried out on behalf of developers at Angmering, questions the viability of the allocation. Moreover, evidence was put before the hearings that in order to deliver a minimum of 800 dwellings at Angmering North set out within Policy H SP2c, only a maximum of 3ha of employment land could be accommodated.</p>	Noted	None
<p>13. The LP should be aspirational but realistic. <b><i>In this context and in order not to compromise the delivery of housing should the employment allocation at Angmering North in Policy EMP SP3 be modified to 3 ha? Alternatively should Policy H SP2c (SD9) include a provision similar to West of Bersted, BEW and Ford about the incorporation of planned new employment provision?</i></b> In relation to the former option mechanisms could be included within Policy H SP2c to ensure that the lesser amount of employment land was made available alongside the housing, possibly as serviced plots. Such changes would require consequential modifications to Policies SD SP1a and EMP SP1. These comments are subject to the allocation being justified in relation to landscape impact as Site 14 identified in PESP5a is the employment land (see paragraph 23 below).</p>	<p>The Council still consider that an allocation is required in the eastern part of the district and would not wish to see it deleted. As it currently stands, the employment land (site 7) forms part of a separate strategic allocation to that of the strategic housing allocation (SD9), albeit they adjoin each other.</p> <p>Evidence, including that prepared by the site promoters indicates that the site can viably accommodate 3ha of employment land, and still supply the correct number of residential units. The Council considers that such a reduction in the size of the employment allocation is a favourable option, on the basis that the employment land would have to be made available and developed alongside the residential development. This will include incorporating both uses into a masterplan for the entire of the land under the site owners/promoters control.</p> <p>Based on the above, the council Consider that the allocation should be reduced in size to 3ha.</p> <p>The policy and the policies map will need to be amended accordingly. In addition, policies SD SP1a and EMP SP1 would need to be modified as a result.</p>	MM

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<b>Matter 4a - The Housing Requirement</b>		
<b>Issue 5 – The Components of Housing Supply</b>		
<p>14. Table 12.1 is to be modified to reflect the position at 31 March 2017. One of the components of the table is Non-Strategic Sites. On the basis that non-strategic sites can be those with a capacity of up to 300 dwellings the figure of 1,250 dwellings seems very conservative even though deliverable HELAA sites within the built up areas are a separate figure. Increasing the supply from this source would increase flexibility through the LP period. <b>The supply from non-strategic sites should be reviewed. At the very least the table should make it clear that the figure is a minimum.</b></p>	<p>The HELAA is a significant source of supply as identified within two of the rows within the table 12.1. The first being 'Deliverable HELAA sites' and the second being the Non-Strategic Sites. When the latest version of the table is used (as of April 2017), a significant amount of the HELAA Deliverable sites have been accounted for. The HELAA contains sites of all sizes from those able to accommodate 5 or more dwellings. As a result, a fair number of sites are available for consideration which fall under the 300 unit threshold. Comments were made at the examination about the HELAA having potential to add approximately 2,000 to the supply and it is assumed that the Inspectors comment about 'conservative' figures is as a result of these comments. As explained at the examination, virtually all of the 2,000 HELAA figure is already included within the supply table in the Plan. 539 is included from the sites identified that are within the existing built up area boundaries and 1,250 is included from small scale sites that will almost certainly be made up of mostly HELAA sites. The figures in the Plan for housing supply are therefore not 'very conservative'. The Council is satisfied that the figure of 1,250 be expressed as a minimum. The HELAA will form the starting point when identifying the sites to include within the Non-Strategic Sites Allocation Document, and be based on the latest version following a 'call for sites' exercise. The suggestion regarding the use of minima/at least is agreed. As a consequence a further modification should be prepared to reflect this in table 12.1. In addition, it is considered that a further amendment should be made to the ultimate bullet point in paragraph 12.1.6 regarding reference to the size of the strategic / non-strategic sites in order to make it clear that there may be instances where non-strategic sites exceed the size threshold.</p>	MM
<b>Local Plan 5 Year Housing Land Supply</b>		
<p>15. The updated figures in PELVP31 relating to the 5 year housing land supply<sup>2</sup> suggest 3565 dwellings would be delivered from strategic site allocations by 2021/22. The numbers are based on trajectories set out in updated Appendix A of the Housing Implementation Strategy (HIS). The LP is unlikely to be adopted until spring 2018 at the earliest. As I understand it only the Fontwell site and discrete phases of the West of Bersted and BEW allocations have planning permission. There are a number of outline planning applications under consideration by the Council (or SoS) but judging from the decision of the Council in relation to Climping the Council may be reluctant to grant permission on LP allocations before adoption. <b>Is it realistic for the strategic allocations to deliver significant completions in 2018/19?</b></p>	<p>The Council is in ongoing dialogue with the various site promoters and developers. The latest information that the Council holds, from them is that they believe that the allocations are able to deliver the housing numbers identified within the HIS. This approach is supported by the Statement of Common Ground that were signed by the promoters for the Local Plan Examination.</p>	None
<b>Housing Implementation Strategy and Policy H SP1</b>		
<p>16. The HIS should show how the Council will maintain a delivery of a 5 year housing land supply during the LP period. One of the components of delivery is the 1,250 dwellings from Non-Strategic Sites to be brought forward through Neighbourhood Plans and a 'Small Sites DPD'. This is referenced in Policy H SP1. In this respect the reference to 'Small Sites' is a misnomer and not consistent with the title in Table 12.1. <b>The term used in Policy H SP1 should be 'non-strategic allocations'.</b></p>	<p>Agreed. A further modification should be prepared to reflect this.</p>	MM
<p>17. More importantly further consideration should be given to the timing of Neighbourhood Plans/Reviews and the 'Non-Strategic Allocations DPD' and how this is expressed in Policy H SP1. Taking into account the timing of delivery of the strategic allocations (see above), the maintenance of a 5 year housing land supply and the need for a range of sites, including those for smaller builders, there ought to be a commitment to begin work on a DPD soon after the adoption of this LP. Whilst I understand the resource constraints and the need to prioritise certain documents e.g. CIL Charging Schedule, it seems that much of the evidence base is already in place e.g. SHELAA. Based on what I was told at the hearings the Council already appears to know which parishes will be preparing Neighbourhood Plans or reviewing existing plans and the sort of housing numbers that they will need to achieve.</p>	<p>Noted.</p>	None

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<p>18. <b>Taking into account the above, the final paragraph of Policy H SP1 could be expressed in terms such as this</b> : 'Additional non-strategic allocations will be made across the District through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans. On adoption of the Local Plan the Council will assess progress on Neighbourhood Plans and immediately commence the production of a Non-Strategic Allocations DPD for those areas of the District which will not be covered by up-to-date Neighbourhood Plans'. Consequential amendments will also be required to paragraphs 2.1, 12.1.7 and 12.1.8.</p>	<p>Noted and agreed. The final paragraph of policy H SP1 should be expressed as suggested. Consequential amendments should also be made to paragraphs 2.1, 12.1.7 and 12.1.8  <b>MM</b> 'Additional non-strategic allocations will be made across the District through emerging Neighbourhood Plans or reviews of made Neighbourhood Plans. On adoption of the Local Plan the Council will assess progress on Neighbourhood Plans and immediately commence the production of a Non-Strategic Allocations DPD for those areas of the District which will not be covered by up-to-date Neighbourhood Plans'.</p>	MM
<p>19. Such an approach would also help to allay fears that strategic sites would share too much of the burden for infrastructure provision. Although the Council has concerns about maintaining delivery over the LP period and the timing of infrastructure provision, in reality it is unlikely that delivery would spike significantly above the trajectory. Moreover, phasing mechanisms could be included in such a DPD. In the longer term LP review would allow the requirement, allocations, infrastructure provision and delivery to be adjusted to take into account up to date evidence.</p>	Noted.	None
<p><b>Matter 4c - Strategic Housing Allocations – Greater Bognor Regis (SD1-SD3)</b></p>		
<p><b>Constraints – Special Protection Area (SPA)</b></p>		
<p>20. The allocation at Pagham South lies close to the Pagham Harbour SPA (just outside the 400m buffer). Technical Note PELP33a (September 2017) indicates that it would be prudent to undertake additional surveys for Brent Geese over the winter period between October and March. Correspondence from Natural England that I have seen preceded the Technical Note. At the hearings Natural England supported the conclusions of the Technical Note that further survey work should be carried out. <b>Taking into account the latest position and evidence available are Natural England in a position to confirm in writing at this stage that the Pagham South allocation alone or in combination with other developments would not have significant effects on the European site?</b></p>	<p>Natural England have provided an explanatory note which is added to the evidence for the Local Plan PELP33b alongside the Habitats Regulations Assessment evidence. In summary, Natural England have confirmed that the Pagham South allocation alone or in combination with other developments would not have significant effects on the European site</p>	See also Natural England Background note PELP33b.
<p><b>Matter 4e - Strategic Housing Allocations Inland Arun (other than BEW) (SD6-SD11)</b></p>		
<p><b>General</b></p>		
<p>21. The figure of 'at least 400 dwellings' for the allocation at Yapton (SD7) appears to be inaccurate based on the site area and the background information which led to the allocation. <b>On the assumption that the provision of a one form entry (1FE) primary school remains a requirement of the allocation then the policy should state 'at least 500 dwellings'.</b></p>	<p>Noted, however the Council believe that the issue of a specific capacity is one that should be considered as part of a planning application, and not the Local Plan. The Local Plan identifies that the site will accommodate 'at least 400 dwellings' which means that it can potentially accommodate a higher figure, subject to capacity and design testing.  The allocation is currently subject to a pre-application advice request and, based on the information submitted, there are concerns about the ability of a higher number of units (over 500) to be accommodated on the allocation.  As a consequence, the Council do not propose to modify the capacity of the allocation.</p>	None
<p>22. For Angmering North (SD9) the provision of at least 800 dwellings would appear to be dependent on the employment allocation being reduced to 3 ha. As mentioned in paragraph 13, a reduced employment component should be phased to be brought forward alongside housing. <b>Policy H SP2c and the Policy Maps would need to be modified to have regard to the phasing, the reduction in employment land and the increase in the land take of the housing allocation.</b> These comments are subject to the allocations being justified in relation to landscape impact (see paragraph 23 below).</p>	<p>In light of the response provided to the question raised in paragraph 13, a modification is required to policy H SP2c - SD9 (Angmering North). This modification will relate to the fact that the allocation should be developed alongside the employment allocation (site 7).</p>	MM

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<b>Constraints</b>		
<p>23. Some of the sites at Angmering North (those bordering the South Downs National Park (SDNP)) are shown to have 'substantial' landscape sensitivity and 'low capacity' for development (Sites 12b, 12d and 14 in the Landscape Capacity Study PESP5a). The sites are particularly visible from the publicly accessible elevated ground at Highdown within the SDNP but I could not see any specific analysis of viewpoints/receptors from this direction in PESP5a. I note that the SDNP Authority do not object to the allocations subject to the inclusion of an additional criterion within Policy H SP2c on landscape appraisal. I also accept that mitigation can be built into the developments in terms of landscape structure, retention of existing vegetation and buffer planting. <b>However, further information to justify the soundness of the allocations in terms of landscape impact would assist me.</b></p>	<p>Further consideration has been undertaken on the strategic allocation from a landscape perspective. This has included consideration of view point/receptors etc. This information is contained with an additional note which has been prepared in order to provide further information and clarity. In summary, it is considered that the effects on the setting of the SDNP are geographically limited and most residual effects would be capable of being mitigated. As a consequence, the Council consider that the allocation is sound and can be justified from a landscape perspective.</p>	<p>See additional background paper PESP6 Angmering North Allocation - Landscape Assessment</p>
<b>Infrastructure Requirements</b>		
<p>24. In terms of the requirement for new primary schools at Yapton and other locations, the County Council's approach set out in the September 2017 update on school provision appears to be based on the assumption that the need for increased capacity is best dealt with by new schools linked to the allocations. During the hearings discussion took place about a number of related factors such as optimum school size, the scope to extend existing primary schools (to sustain them and reach an optimum size) and the preferences of the community. For example the indication was that Yapton would prefer to maintain a single primary school rather than have two. As a result of a planning application provision at Climping is to be through the expansion of the existing school rather than a new school.</p>	<p>Noted</p>	<p>None</p>
<p>25. <b>Is the County Council able to provide more information on the factors outlined above - optimum school size, the scope to extend existing primary schools (to sustain them and reach an optimum size) and community preferences?</b> This would enable me to consider such factors in assessing the soundness of particular allocations and the primary school components.</p>	<p>WSCC have justified their requirements. The strategic housing allocation policies have been revised to provide adequate flexibility. The Strategic allocation policies H SP2a, H SP2b and H SP2c have been revised in light of all of the infrastructure comments. See additional note of clarification from WSCC on Primary School Provision SEDP9.</p>	<p>MM WSCC Paper on Primary School Provision SEDP9.</p>
<b>Matters 6 and 8b – Transport and Other District-Wide Infrastructure</b>		
<b>Transport Schemes</b>		
<p>26. The Arun Transport Study 2016 Stage 3 Report (PECP9) refers to mitigation works in relation to certain junctions. The study has been updated by the Transport Review 2017 (PECP10). Paragraphs 5.2.1 and 5.2.2 of the latter refer to the junctions where mitigation may potentially be required due to severe capacity issues or safety risks. However, there is inconsistency between 5.2.1 which refers to 20 potential locations and 5.2.2 which refers to 5+7+3 junctions =15 junctions. The discrepancy appears to be that the 3 junctions with safety risks and the 2 junctions 'not identified in ATS 2016 Stage 3' are not referred to in paragraph 5.2.2.</p>	<p>The number of junctions complex and can appear to chop and change through the report. For one example it is because a junction is identified for safety and capacity issues so appears in two places. For another reason some junctions already have mitigations designed and costed and the report only presents new designs proposed by Systra for the report.  There are 20 mitigation locations, 18 of which are identified as having 'severe' impacts, with two 2 identified as safety risks only. The junctions with the 'severe' impacts are identified in paragraphs 5.2.2, 5.2.3 and 5.2.4.  Two amendments have been made to the study (PECP10): The text in paragraphs 5.2.1 and 5.2.2 (page 25) has been reworded to improve clarity and to ensure that the numbers 'add up' correctly. Table 12 Junction 21 is also amended to show more clearly, and consistently, that it is identified for both capacity and safety.</p>	<p>See PECP10 (updated November 2017) which has had some additional text added for clarity.</p>

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27. In order to consider the LP in the context of paragraph 32 of the National Planning Policy Framework an explanation is required as to why the 2 junctions identified with the potential for severe impacts are not then taken forward to Stage 3. In this regard I note that the summary sheet v3 within PECP10 includes ratio of flow to capacity (RFC) (%) figures for various scenarios.	Please see the answer to 28.	Please see the answer to 28.
28. The B2266 Lower Bognor Road/Pagham Road Junction (No 53) has RFC (%) figures for 2031 without mitigation of up to 123 % but with the EBR mitigation a RFC (%) of up to 108%. The latter RFCs are lower than the '2031 Reference Case' highest RFC (%) of 112%. Similarly the RFC (%) for the B2259 Felpham Way/B2132 Middleton Road (No 44) is reduced from a worst case 104 RFC (%) without mitigation to up to 92 RFC (%) with the EBR mitigation. The latter RFCs are lower than the '2031 Reference Case' highest RFC (%) of 95%. Thus it seems that the position in 2031 based on existing commitments but without mitigation of junctions set out in PECP10 would be worse than the 2031 with EBR mitigation. <b>Is my understanding correct? Does this explain and provide sufficient justification for not taking forward the 2 junctions for mitigation?</b>	The Transport Consultants have confirmed that this understanding is correct. Paragraph 4.4.2 states criteria that identify severe impacts which the mitigations aim to remove. It is possible for the mitigations to reduce the Ratio of Flow to Capacity (RFC) and/or delay to a level lower than in the reference case. It should be noted that, in the case of junction nos. 44 and 53 (and 21) removal of the severe impacts is achieved through rerouteings resulting from the initial (and final) proposed mitigations at other junctions as noted in revised report paragraph 5.2.4 and Table 12. Mitigation at these junctions is therefore not required.	Please see the answer to 28.
29. It does not appear that more detailed assessments connected with planning applications in Pagham have led to a need for mitigation to the B2266 Lower Bognor Road/Pagham Road Junction other than any benefits arising from more general sustainable transport measures (see hearing statements and Cumulative Transport Assessments attached to SOCG for Pagham – ADCED70, 84 & 85). <b>Is this correct?</b>	This question relates to a TA rather than the Local Plan Transport evidence however, consultants have confirmed that the evidence work showed a problem on B2166/Pagham Road without mitigation that was removed with mitigation – not at this location but due to re-assignment resulting from other mitigation at other junctions i.e. re-routing to A259 due to Bognor Road Roundabout mitigation.	None
30. With regard to the 3 junctions with safety impacts it is noted that these are not identified as having severe capacity impacts (paragraph 5.3.1 of PECP10). The A29 Lidsey to Shripney is not taken forward as safety concerns would be resolved by the A29 realignment. The 2 schemes at junctions on the A259 (20 & 21) are carried forward into Table 30 (Summary of Apportionment Results). However, the 2 junctions are not included in Table 31 (Estimated Mitigation Construction Costs) as designs have not been prepared as part of the transport studies. <b>What is the explanation for excluding the 2 junctions with safety impacts? Should improvements be designed up so that they can be costed? Has more emphasis been put on capacity rather than safety and if so why?</b>	The junctions with safety impacts were nominated by WSCC and have been considered as part of the evidence for the Local Plan. The designs are being considered by WSCC as part of other work, who advised the consultants preparing the study of the assumptions to include for the modelling (as noted in table 12). it should be noted that the junctions were included in the apportionment because they are included as mitigations.	None
31. At the hearings the West Sussex County Council (WSCC) Transport representative made reference to a study to be begun in 2018 which would consider the A259 more comprehensively. It was stated by WSCC that more wide ranging improvements were not needed to the A259 to support planned growth in the LP. Moreover I note that such a scheme is not referred to in PECP10 or in the LP, including Policy T SP3. That said of the 15 schemes included within Table 30 of PECP10 seven are junctions on the A259. <b>What is the timetable for a study of the A259? Should reference be included to it within Policy T SP3 or elsewhere in the LP with a view to work being eventually funded through CIL?</b>	West Sussex County Council have responded to the question as follows: "In 2018 the County Council will be reviewing the need and priority for a study on the A259 alongside other priorities for capital investment in the highways and transport network as part of a review of the Strategic Transport Investment Programme. As such there is not a fixed commitment for a study of the A259 until this review is complete. WSCC Cabinet Member for Highways and Infrastructure stated at the end of September 2017: "Arun District Council's Strategic Transport Study Stage 3 already assesses the cumulative impacts of development on the network, including A259. It identifies the need for some improvements to junctions on A259. Following the study, we have said that improvements to the links between the junctions may also be required in the plan period. Any further technical work should build on, rather than repeat this study.  A separate feasibility study will need to be commissioned to develop detailed proposals for the corridor. We will consider this as a potential priority for investment when the Strategic Transport Investment Programme is reviewed in 18/19. "	None
<b>District wide infrastructure projects</b>		

INSPECTOR'S INTERIM FINDINGS FOLLOWING HEARING SESSIONS	Arun District Council Response	Will there be a (MM) or reference for Evidence
<p>32. I have some outstanding concerns on the issue of pooling limitations. The limitations could impact on the delivery of some key infrastructure such as the secondary school, new primary schools and indoor sports and leisure facilities. There could also be a disproportionate burden for those sites which could come along first, including some of the strategic allocations, which might be a disincentive to delivery. However, a solution which can be incorporated into policies within this LP is not obvious. <b><i>I would suggest that the best approach would be to include within the LP a commitment to progress a CIL Charging Schedule immediately after the adoption of the LP (assuming that CIL is retained in some form at national level).</i></b></p>	<p>Noted and agreed. See the response to paragraph 33 below.</p>	<p>MM</p>
<p>33. Policy INF SP1 should be modified to reflect such a commitment. The wording should be along the following lines (4<sup>th</sup> bullet point of policy): <i>Where a contribution towards other district wide infrastructure improvements or provision is needed and viable this will be achieved through the Community Infrastructure Levy Charging Schedule and Regulation 123 Infrastructure List which will be introduced as soon as possible after the adoption of this Local Plan. Until such time as a Charging Schedule is adopted contributions will be achieved through planning obligations (where they meet the statutory tests).</i></p>	<p>Noted and agreed. A MM is proposed regarding CIL, based on the suggestion by the Inspector. This is on the assumption that CIL is retained:</p> <p><u>Where a contribution towards other district wide infrastructure improvements or provision is needed and viable this will be achieved through the Community Infrastructure Levy Charging Schedule (assuming it is retained) and Regulation 123 Infrastructure List which will be introduced as soon as possible after the adoption of this Local Plan. Until such time as a Charging Schedule is adopted contributions will be achieved through planning obligations (where they meet the statutory tests).</u></p>	<p>MM</p>
<p>34. The explanation to the policy could include an indication of the likely timescale for the adoption of a Charging Schedule. In this respect the timetable included at paragraph 31 of the Council's Matters 6 and 8b statement seems somewhat protracted. It should be condensed if possible on the basis that much preparatory work has already been undertaken in respect of infrastructure requirements and costings (PEDP4 &amp; 5).</p>	<p>Add the following text to paragraph 22.0.9 to read:</p> <p><u>To secure a mechanism for contributions towards infrastructure the Community Infrastructure Levy will be introduced as soon as possible after the adoption of this Local Plan. The levy will be needed to seek contributions for small sites which are essential to meet the housing needs in the medium term for this reason it is essential that CIL is introduced no later than mid way through the second housing delivery phase as shown in table 12.1 and policy H SP1.</u></p> <p>A detailed timetable for CIL will be included in the Local Development Scheme (LDS).</p>	<p>MM</p>