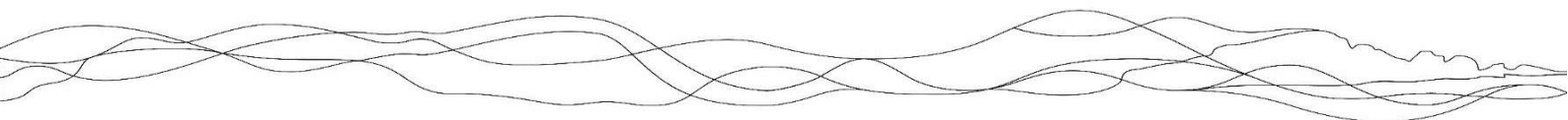


Transport Background Paper

South Downs Local Plan

September 2017



I. INTRODUCTION

Policies covered:

- **Policy SD19:** Transport and Accessibility
- **Policy SD20:** Walking, Cycling and Equestrian Routes
- **Policy SD21:** Public Realm, Highway Design and Public Art
- **Policy SD22:** Parking Provision

1.1 This paper outlines the basis upon which Policies SD19, SD20, SD21 and SD22 of the Local Plan have been formulated. It explains the context behind why the policies are necessary to ensure that the Purposes / Duty of the National Park are met, briefly summarises national policy, and summarises the key evidence base studies which have fed into the policies. It also sets out the transport evidence base supporting the development strategy and development allocations in the Local Plan.

2. NATIONAL PARK PURPOSES & DUTY AND SPECIAL QUALITIES

2.1 Effective planning policies on transport are essential for the South Downs National Park Authority (SDNPA) in fulfilling its purposes and duty, and delivering sustainable development, in cooperation with the local transport authorities. The policies will fulfil the duty and the second purpose by facilitating developments that make it easier for visitors, residents and workers to travel to and around the National Park by sustainable means. Transport policies can help support the SDNPA's duty to communities, by ensuring that growth takes place in the most sustainable locations, so it best meets the needs of residents and businesses while protecting the special qualities.

2.2 For most visitors, their experience of all the special qualities is received mainly whilst travelling, whether along the rights of way network or roads and railways. Many of these routes are heritage assets and important landscape features in their own right. Therefore, it is essential for the first and second purposes of the National Park that the character of such routes, and the relationship between them and the broader environment be protected and enhanced.

3. NATIONAL POLICY AND GUIDANCE

- 3.1** *The National Parks Vision and Circular 2010*¹ states that there needs to be close liaison between the national park authorities and the transport authorities in order to help promote sustainable travel choices. Where there is additional demand for travel in national parks, transport authorities are expected to have considered firstly demand management measures before new infrastructure. Where new transport capacity is considered necessary within national parks, low-carbon initiatives, such as enhancements to public transport, car club and sharing schemes, improved cycling and walking connections (particularly between train stations and other nodes) need to be considered. It also includes a strong presumption against significant road widening or new road building, and a requirement to limit traffic speeds in a landscape-sensitive way.
- 3.2** The *National Planning Policy Framework (NPPF)*² states that local plans should support a pattern of development which, when reasonable to do so, facilitates the use of sustainable modes of transport (paragraph 30) and a balance of land uses which encourages people to minimise journey lengths (paragraph 37). It requires local planning authorities to work with neighbouring authorities and transport providers to develop strategies for infrastructure provision.
- 3.3** Paragraph 32 of the NPPF contains guidance on the design of developments and on local parking standards. Paragraph 35 sets out transport issues to be addressed in the selection and design of new development sites. Paragraph 75 states that planning authorities should seek opportunities to add links to existing rights of way networks, and to protect and enhance public rights of way and access.
- 3.4** The National Planning Practice Guidance contains detailed guidance on how to carry out transport assessments of Local Plans.
- 3.5** Manual for Streets 1 & 2³ and the Design Manual for Roads and Bridges⁴ provide national level guidance on the design of highways and the public realm.

4. LOCAL CONTEXT AND EVIDENCE

- 4.1** The Partnership Management Plan⁵ states that there needs to be a significant long-term shift towards more sustainable transport if the special qualities of the National Park are to be protected, visitor enjoyment maintained and more choice provided for those without a car or the ability to drive. A number of PMP policies seek to deliver this long-term shift, which in turn is carried forward in Local Plan policies. However, it is recognised that the desired modal shift will be delivered through a variety of other mechanisms and in partnership with other bodies. The SDNPA is not a transport authority or a highway authority and the Local Plan is not a local

¹ English National Parks and the Broads: UK government vision and circular 2010 (Defra, 2010)

² National Planning Policy Framework (CLG, 2012)

³ Manual for Streets (DfT, 2007); Manual for Streets 2: Wider Application of the Principles (Chartered Institution of Highways and Transportation, 2010)

⁴ Design Manual for Roads and Bridges (Highways England, last updated 2017)

⁵ South Downs Partnership Management Plan 2014-19 (SDNPA, 2015)

transport plan. Nevertheless, there are a number of transport challenges and opportunities that the Local Plan can tackle directly, and others where it can facilitate improvements carried out by the SDNPA or by partners- notably including Local Transport Authorities.

- 4.2 The National Park overlaps with four Local Transport Authority areas- Hampshire, West Sussex, Brighton & Hove and East Sussex- each with their own Local Transport Plan.
- 4.3 The East Sussex Local Transport Plan 3 - 2011-2026⁶ focusses on Newhaven and on the Eastbourne/South Wealden area as locations for greater transport investment, including working with the NPA to improve walking, cycling and public transport links into the National Park. Lewes is also noted as a gateway town into the National Park.
- 4.4 The West Sussex Local Transport Plan 3 - 2011-2026⁷ refers to the traffic impacts caused by visitors to the National Park. It notes the weakness of public transport in rural areas and puts emphasis on ensuring development occurs in locations that are sustainable in transport terms.
- 4.5 The Hampshire Local Transport Plan 3, Part A Long Term Strategy 2011-2031⁸ commits to enhancing the rural character of highways in the National Parks, and enhancing the network of routes for sustainable local tourism.
- 4.6 The Brighton & Hove Local Transport Plan 4 2015-2030⁹ commits to ‘connecting people with... open spaces and the National Park’ through integrated transport, to developing a masterplan for developing a visitor gateway at Stanmer Park, supporting the Brighton and Lewes Downs Biosphere Partnership and the South Downs Partnership Management Plan, and seek to reduce car travel and improve sustainable transport access across the National Park.
- 4.7 All the Local Transport Authorities have also produced lower-level planning documents setting out their investment priorities in more detail. These have been integrated into the South Downs Infrastructure Delivery Plan where relevant.
- 4.8 They have also produced Rights of Way Improvement Plans (ROWIPs) (or equivalent documents, for example the Hampshire Countryside Access Plan 2015-2025), which have informed the Local Plan - in particular Policy SD20 but also Policy SD21.
- 4.9 The document ‘Roads in the South Downs’¹⁰ was commissioned by the SDNPA in close collaboration with the local highway authorities. It contains high level guidance on locally appropriate highway design for the area. The guide aims to help avoid the tendency for highways to suburbanise and standardise the landscape. It combines an approach based on careful analysis of appropriate design speeds for traffic with an emphasis on distinctive place-making, village entrances and an integration of roads and streetscapes with their surrounding buildings, features and landscape elements. The document features several case studies illustrating how these principles have been or could be applied in practice.

⁶ Local Transport Plan 2011-2026 (East Sussex County Council, 2011)

⁷ West Sussex Transport Plan 2011-2026 (West Sussex County Council, 2011)

⁸ Hampshire Local Transport Plan Part A Long Term Strategy 2011-2031 (Hampshire County Council, 2011)

⁹ Local Transport Plan 2015 (Brighton & Hove City Council, 2015)

¹⁰ Roads in the South Downs (Hamilton-Baillie Associates Ltd, 2015)

- 4.10** The SDNPA commissioned a Transport Study Phase I in 2013¹¹, which reviewed extant data on transport issues in the National Park and recommended focussing on five policy implications:
- Public transport accessibility as a spatial planning criterion;
 - Growth in visitor access and activity as a means of achieving a more sustainable local economy;
 - Managing access points to reduce negative impacts at hotspots;
 - Planning access points and interchanges to boost visits by sustainable means; and
 - Planning rights of way improvements in relation to access by sustainable means of travel.
- 4.11** Following on from the Transport Study, a detailed Access Network and Accessible Natural Greenspace Study¹² was carried out. This reviewed connectivity between the Rights of Way network, publicly accessible green space, centres of population and areas of deprivation. The study found that many towns along the southern and western border of the National Park were short of green space, and the National Park is an important area for provision of green space for the whole urban coastal belt, but that connectivity needs to be increased. The results of this are reflected in Policy SD20 Criterion 4, encouraging the provision of crossing points across strategic transport routes.
- 4.12** The Local Plan Transport Assessment (2016)¹³ assessed the traffic implications of the housing and employment allocations in the Local Plan. The project was carried out in close collaboration with West Sussex and Hampshire County Councils, and consulted on with Highways England. Following advice from local highway authorities, the study modelled the traffic impact of various development scenarios on key junctions in and around settlements and major sites where over 80 dwellings are proposed to be allocated: namely, Petersfield, Midhurst, Liss, Petworth and the former Syngenta site. The junction modelling found that while traffic growth caused by Local Plan allocations is expected to be relatively minor, when this is combined with the much greater levels of background traffic growth, three junctions are at risk of 'severe' impacts. The assessment proposed that expected traffic congestion could be reduced to acceptable levels by physical mitigation measures for one of these junctions (in Petersfield). Sensitivity testing was carried out on the results for the remaining two junctions, in Midhurst and Petworth, and it was found that an acceptable traffic impact could be achieved by the reassignment of long distance traffic away from those settlements, which could be encouraged by traffic management measures. Work is ongoing with West Sussex and Hampshire County Councils to establish the detail of these mitigation measures.
- 4.13** The Local Plan Transport Assessment Supplement (September 2017)¹⁴ was carried out to take account of changes in the number and precise location of dwellings proposed to be allocated in Midhurst and Easebourne, compared with the figures used to support the original assessment. After sensitivity testing, the traffic impacts in the new scenario were found to be broadly similar

¹¹ SDNPA Transport Study- Phase I Report (MTRU, 2013)

¹² Access Network and Accessible Natural Greenspace Study (Environment X Change, 2014)

¹³ Transport Assessment of the South Downs Local Plan (Hampshire Services, 2016)

¹⁴ Midhurst and Petersfield Junction Assessments (Hampshire Services, 2017)

to those in the scenario previously considered. The study also looked in more detail at one junction on the A3 at the request of Highways England, but found the traffic impacts there not to be significant enough to require a change in the existing road layout.

- 4.14** East Sussex was excluded from these transport assessments since the Lewes Town Transport Study (2011)¹⁵ and transport assessment work carried out on the North Street Quarter site¹⁶ was considered to adequately support the proposed level of development there. Transport assessment of development at the other strategic site, Shoreham Cement Works, will be conducted as part of the Area Action Plan for the site, once the expected quantum and nature of development at the site is more firmly established.
- 4.15** The Site Allocations Highways Assessment (2017)¹⁷ assessed the highway access implications of specific proposed housing and Gypsy and Traveller allocations that were identified as having potential highway access issues. The study included assessment of the impact on surrounding traffic flows. The feasibility of alternative access points was assessed where relevant, and sketch maps were produced showing the measures deemed necessary at each potential access point. The study resulted in some sites not being taken forward for allocation, alterations to the development requirements for other draft allocations, and provided proportionate evidence for the allocation sites taken forward.

5. ROUTE MAP FOR POLICY FORMULATION

- 5.1** The key local plan policies relating to transport, movement and access are Policies SD19, SD20, SD21 and SD22. The paragraphs below set out the key considerations in developing these.
- 5.2** At the outset of the Local Plan process, the existing evidence and Joint Core Strategies were reviewed and four key issues identified: protecting existing routes for use as sustainable transport routes; car parking; ensuring new development takes place in accessible locations, and ensuring new development contributes to improving sustainable travel networks. The Options Consultation Paper¹⁸ then proposed three ‘issues’, each of which yielded a preferred policy approach, and alternative options. The three issues were:
- How can the Local Plan best protect existing routes for use as sustainable transport routes?
 - What should be the Local Plan’s approach to car parking?
 - How can the Local Plan best ensure that new developments are accessible?
- 5.3** Responses received to the Options Consultation were very positive for most of the options, and respondents also took the opportunity to suggest a range of other issues and policy approaches. To begin the next stage of work on the transport policies, a multidisciplinary group of SDNPA officers was convened to review the consultation responses, alongside the evidence,

¹⁵ Lewes Town Transport Study (TPi, 2011)

¹⁶ Planning application SDNP/15/01146/FUL

¹⁷ SDLP Site Allocations Highway Assessment (Hampshire County Council, 2017)

¹⁸ South Downs National Park - Local Plan: Options Consultation Document (SDNPA, 2014)

plans, policies and projects. Consequently, four draft policies were drawn up and discussed with NPA members and with representatives of the Local Transport Authorities. These three groups (the internal officer group, the member group and the LTA representatives) continued to help develop the policies up to the Preferred Options consultation and then to revise them after that consultation, to produce the Pre-Submission version of policies. The Local Plan was also discussed at meetings held with the Local Access Forum and Highways England, which likewise fed into the policies. The issues dealt with by the respective policies are described below.

SD19: Transport and Accessibility

- 5.4** Work on the State of the Park Report and Partnership Management Plan uncovered that, with about 46 million individual visits every year, the South Downs National Park is one of the South East Region's most popular tourist destinations. However, the overwhelming majority of visitors come by car. There is also significant traffic generated by commuting with around 24,900 commuters coming into the Park and 22,500 commuting out of the park to work daily. The increasing use of vehicular transport within the National Park can threaten the very qualities of tranquillity and other environmental qualities that attract visitors in the first place, as well as causing congestion at popular sites. Transport accounts for around one third of carbon emissions so traffic levels are also a climate change issue.
- 5.5** The Transport and Accessibility policy aims to tackle this issue in three ways: by ensuring new development takes place in relatively accessible locations so that car travel is minimised, by facilitating the development of public transport networks, and by facilitating schemes to reduce the impact of traffic on town centres.
- 5.6** Work previously carried out on the Lewes Joint Core Strategy¹⁹ had produced a robust policy on ensuring that new development is sustainably located. The JCS policy therefore provided a good basis for developing Policy SD19. Feedback from the local transport authorities led to further refinement and fine-tuning of the draft policy.
- 5.7** The section on improvements to public transport networks drew on evidence from the Transport Study Phase I and local transport plans for the area. These were reviewed to identify public transport related projects which involved physical development, and therefore may require planning permission. The policy specifically encourages the development of such projects. A particular focus of this section is improving connectivity, including by walking and cycling, around transport interchanges. This is tied to concept of 'hubs' and gateways' for the National Park, as described in the Transport Study Phase I, the Local Plan's Spatial Portrait, and now in the draft National Park Cycling and Walking Strategy.
- 5.8** The fifth criterion, on development in town and village centres, was carried forward from an existing policy in the Lewes Local Plan, which plays an important role in the plans for improving air quality in Lewes Town Centre, as well as having other benefits to the urban environment more generally. This approach has been extended to other town and village centres across the National Park.

¹⁹ Lewes District Local Plan Part I Joint Core strategy 2010-2030 (SDNPA/Lewes District Council, 2016)

SD20: Walking, Cycling and Equestrian Routes

- 5.9** The first issue addressed by this policy is that raised by the Transport Study Phase I, Access Network and Accessible Natural Greenspace (ANG) Study²⁰, and by rights of way improvement plans (or equivalent documents) for the local area, regarding the need to create a network of attractive and functional multi-user routes. The ANG study found that the National Park is generally well provided with public rights of way, but that the areas with better rights of way provision do not always coincide with areas where the need is greatest (i.e. near to urban areas), and there are problems with connectivity between different parts of the network. Unlike those National Parks which have larger areas of access land, the SDNP is particularly dependent on public rights of way to deliver the second purpose. There are multiple projects in the Infrastructure Delivery Plan intended to improve the rights of way network, and the Cycling and Walking Strategy also aims to deliver this objective.
- 5.10** The second and third parts of the policy relate to the safeguarding of specific routes for future development as non-motorised transport routes, railway and canal use respectively. The potential railway and canal routes follow a former railway and a former canal respectively, while the potential non-motorised routes also follow former railway lines. This approach will provide opportunities for people to appreciate heritage assets, make use of the gentle gradients created by past generations, and minimise the creation of new linear features on the landscape. The supporting text to the policy makes clear that, when the routes are actually constructed, they may diverge from these safeguarded lines, but the evidence base does not yet exist to support the safeguarding of any alternative route. There are several existing, and therefore safeguarded, non-motorised routes along former railways. The expansion of this network is a longstanding aim of the National Park Authority, which would deliver multiple benefits for the second purpose and the duty of the National Park, and is also reflected in the draft Cycling and Walking Strategy. The precise list of routes included in the policy has been amended over the course of plan production, as a result of consultation responses from local groups and Natural England, and as a result of the Habitat Regulations Assessment.
- 5.11** The fourth part of the policy addresses the problem caused by major roads and railways blocking access into and around the National Park for walkers, cyclists and equestrians. The A27, which runs close to long stretches of the National Park border and separates it from most of the urban areas of the Sussex coast, is a particular source of problems, but the issue also occurs in many other locations around the National Park. The problem was highlighted clearly by the ANG Study and the NPA actively pursues opportunities to create new linkages across major roads and railways in appropriate locations where this is consistent with protecting landscape quality. The policy supports such developments while protecting existing crossing points. The policy has been drafted to meet the concerns of Network Rail (expressed through the Preferred Options consultation) regarding safety, while restricting the loss of level crossings where non-motorised routes are involved.

²⁰ Access Network and Accessible Natural Greenspace Study (Environment X Change, 2014)

SD21: Public Realm, Highway Design and Public Art

- 5.12** This policy is key in delivering the First and Second Purpose of the National Park, protecting the environment and experience of the public realm. Firstly, the policy deals with newly constructed areas of public realm, with reference to 'Roads in the South Downs'. As well as directly requiring that proposals follow the principles of that document, key elements of the principles are incorporated into the policy itself, for example on the experience of movement through a site, and on context-sensitive design. Safety is also an essential element of the policy and developments will be refused where they fail to deliver both safety and good design.
- 5.13** The second element of the policy relates to the protection of historic rural roads which are a distinctive feature of the National Park. These roads are essential to delivering the National Park's second purpose since they form part of almost any rural walk, horse or cycle ride. Physical damage (for example by access to new development, and/or by traffic eroding verges and roadside vegetation), and damage to the amenity of rural roads as a result of additional traffic, are highlighted as problems in the South Downs Integrated Landscape Character Assessment²¹ and in rights of way improvement plans. These issues were also raised by multiple participants in the Local Plan Options consultation. The Local Plan treats historic rural roads (defined as those pre-dating the Ordnance Survey Second Edition around the turn of the twentieth century) as landscape heritage assets whose value requires protection, and sets out how developers should assess the impact of their proposals on this value.
- 5.14** Lastly, the policy incorporates a criterion and supporting text on public art. Much of the traditional built form of the National Park is rural, vernacular and functional in character, so public art will not be desirable in every development location, but the policy provides support for good public art in the right place.

Policy SD22: Parking Provision

- 5.15** The first issue covered by the parking policy relates to the principle of public parking development. Given that the general policy of the SDNPA is to reduce car travel (PMP policy 38) and manage vehicle parking to reduce the impact of traffic and parking (PMP policy 39), it was not considered appropriate to allow the general construction of car parks in the countryside. Instead, the Options Paper proposed allowing new car parking (other than parking to accompany new development) in town and village centres and at visitor attractions. An additional option was suggested, allowing for new public parking elsewhere if it was a proven component of a strategic traffic management scheme. Both these options achieved a high level of support, though support for the first option was higher. The policy was based on these earlier options, albeit refined to take into account detailed comments made at the two consultation stages.
- 5.16** The second issue covered was the level of private parking required for new development. It was considered that drawing up detailed standards was beyond the scope of this Local Plan. The National Park is in the difficult situation of dealing with parking standards in four different local highway authority areas (East Sussex, Brighton & Hove, West Sussex and Hampshire), each of which have been drawn up with regard to the needs of their own area. The policy therefore in

²¹ South Downs Integrated Landscape Character Assessment (Updated) (SDNPA/LUC, 2011)

effect defers to locally evidenced standards developed in each of these four areas. As a result of Preferred Options feedback, a requirement for electric vehicle charging facilities was included.

- 5.17** The last set of issues relate to the effect of parking areas on ecosystem services, and ensuring they provide for the needs of a wide variety of users. As a relatively extensive land use, which is most often constructed on greenfield land, parking areas risk having a high impact on the landscape, wildlife, and the water cycle. Preferred Options consultation responses suggested that a further range of factors should be taken into account, including the effect of converting garden space, electric vehicle charging facilities, mobility scooters and horse box parking. These have been included in the policy or supporting text as appropriate.

6. CONCLUSIONS

- 6.1** The transport policies in the Local Plan are the product of a large body of evidence- including public consultation results- and officer expertise from across the NPA, and intensive Duty to Cooperate work. The policies are intended to limit traffic growth arising from new development, encourage travel by sustainable modes, and protect and enhance the public realm (including public rights of way). The transport assessment work carried out in support of the development strategy has found that the impact of proposed development traffic in the Local Plan on traffic levels can be adequately mitigated. The highways impact of specific sites proposed for allocation in the draft Local Plan has also been tested, which has fed directly into the site selection process, and informed refinement of the allocation policies where appropriate.