

WORTHING LOCAL PLAN

Comments on Transport Policy CP24

1. OVERVIEW

- 1.1 The negative impacts of poor air quality and unchecked climate change are huge and transport is a major contributor. The strategic objective (SO20) to “provide an integrated, safe and sustainable transport system” is not backed up by a Transport Policy robust enough to ensure that Worthing will make a positive contribution to the UK’s legally binding targets on either issue. There is no sense of urgency; no measureable targets; and insufficient detail to turn an aspiration into a coherent plan.
- 1.2 The aspiration “to promote and enhance sustainable transport options to help achieve a shift in people’s travel behaviour” will remain an aspiration while the major investment continues to be in motorised transport. The Transport Policy embeds increases in road capacity through “improvements to the road network including the A259 and A27” and a Transport Assessment that details the remodelling of junctions within the borough to accommodate increases traffic from new developments.
- 1.3 ***In effect, the Transport Policy is aiming to accommodate more vehicles on Worthing’s roads, not less.*** In the short-term, improved journey times will make car journeys more attractive. The pressure to find more space for road capacity and car parking will further restrict the options for sustainable transport. Sustainable transport will continue to be regarded as mitigation that will be done as and when funding permits.
- 1.4 To make a significant shift away from car dependency – and tap into all attendant benefits – requires a new vision for transport; a move away from the ‘predict and provide’ approach in which transport models are based on past trends. The South Coast Alliance for Transport and the Environment has reviewed the evidence base and set out a detailed range of policy options in its report *A New Transport Vision for the Sussex Coast* ¹
- 1.5 The local evidence to support a new transport vision is strong:
 - In its 2017 consultation, Highways England conceded that it has no long-term solution to congestion on the A27, and that “local authorities would need to consider measures to reduce long term growth such as traffic restraint policies, improvements to public transport and increased cycling and walking.”
 - The report on the public consultation on increasing the capacity of the A259 to the west of Worthing [WSP, 2016] recorded “a number of issues and concerns (both technical and strategic) that need to be addressed going forwards, including... whether the improvement works will alleviate congestion on the A259 or simply move it elsewhere – e.g. to adjacent junctions, or rat-running through local communities.”
 - The potential for modal shift of short, local journeys is recorded in the WS Local Transport Plan [p29]: “the majority of traffic using the A27 in Worthing and Lancing starts or ends its journey in Worthing or Lancing, with around a third being through traffic.”
- 1.6 The Transport Policy CP24 needs specific commitments to support the NPPF objectives to prioritise walking and cycling with regard to:
 - The Adur & Worthing Local Cycling and Walking Infrastructure Plan [see 2.1 below].

- Cycle Infrastructure Design Standards [see 2.2 below].
- Key, arterial cycle routes [see 2.3 below].
- Policies and processes to support the provision of cycling and walking in new developments [see 2.4 below].

1.7 As an evidence base, the Transport Assessment gives only cursory consideration to cycling, and has failed to identify issues that need to be addressed by the Transport Policy:

- The conclusion is vague; is at odds with the WS Local Transport Plan; and does not recognise the importance of a progressive Road Space Audit [see 3.1 below]
- There are errors and omissions, amongst which the lack of an up-to-date inventory of cycling infrastructure is a major hindrance to effective planning [see 3.2 below].
- Road safety for cyclists is not analysed, and modifications to junctions discussed with no specific mention of the needs or safety of cyclists [see 3.3 below].

One conclusion is that a comprehensive and effective Local Cycling and Walking Infrastructure Plan (LCWIP) is absolutely essential.

2. COMMITMENT TO SUPPORT WALKING AND CYCLING

The Transport Policy CP24 needs specific commitments to support the NPPF objectives to prioritise walking and cycling.

2.1 Local Cycling and Walking Infrastructure Plan (LCWIP)

CP24 should put on record the intention that the Adur & Worthing LCWIP will be a supplementary planning document.

The ministerial forward to the NPPF says that “in order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.” LCWIPs are defined in the NPPF as “a new, strategic approach to identifying cycling and walking improvements required at the local level”.

Paragraph 4.284 says that the policy (CP24) needs to “highlight the work of the Adur & Worthing Walking & Cycling Action Group (emerging Local Cycling and Walking Infrastructure Plan)”. This is not reflected in the policy itself and if the LCWIP is to be effective it needs more than ‘highlighting’.

To be effective, the Adur and Worthing LCWIP will need to have the status of a supplementary planning document. Moreover, it should be a requirement that it is updated when plans for new development are put forward. CP24 needs to make clear that the LCWIP will be operative in this way as soon as it is approved.

2.2 Cycle Infrastructure Design Standards

CP24 should set out that cycle infrastructure design standards must be used to support national and local strategies to increase levels of walking and cycling, and to improve safety.

Paragraph 4.295 of the supporting text is an invitation to developers to pick the least onerous standards: “When considering applications, proposals will be expected to comply with the criteria contained in Worthing Borough Council’s and West Sussex County Council’s adopted planning /

guidance documents relevant to design, car and cycle parking, ***or any other appropriate national standard.***” [My italics]

In order to support “the development of a network of high quality walking and cycling routes throughout the borough” [CP24, b, iii], it must be made clear that design standards are to be used with the intention to provide high quality infrastructure; not to justify the minimum quality possible. Moreover, the application of design standards must be based on a detailed assessment of the needs of all Non-Motorised Users and must take into account objectives to significantly increase the number of cycling trips and to improve safety.

2.3 Key Arterial Cycle Routes

CP24 should make specific commitments to the development of arterial cycle routes which are critical to the development of a Worthing Cycle Network.

- National Cycle Network Route 2 between Worthing and Littlehampton. Completion of NCN route 2 is prioritised in both the Coast to Capital Local Enterprise Partnership (LEP) Strategic Economic Plan and the West Sussex Strategic Transport Investment Programme. The section in Goring between George V Avenue and Sea Lane has been prioritised in the WSCC Local Transport Investment Programme.
- A24 Worthing Town Centre to Washington. Phase 1, Findon Valley to Findon Village, has been prioritised in the WSCC Local Transport Investment Programme, and feasibility work started.

2.4 New Developments

CP24 should require that plans for new developments include:

- **An accurate inventory of existing cycling infrastructure, including a qualitative assessment.**
- **An update (agreed with stakeholders) to both the Adur & Worthing LCWIP and the list of potential cycle routes in the WS Walking and Cycling Strategy.**

The Transport Assessment recognises that “new development brings an opportunity to consider the further development of the walking and cycling network to improve wider sustainable transport provision to serve the new development and existing residents alike.” The two requirements proposed here are designed to ensure that happens.

3. EVIDENCE BASE

As an evidence base, the Transport Assessment gives only cursory consideration to cycling and fails to identify issues that need to be addressed by the Transport Policy.

3.1 Assessment of Cycling Provision

The overall assessment of cycling provision is vague [“it could be considered that the existing network has some areas of limited provision and is missing links”; page 82]. This is at odds with the assessment in the WS Local Transport Plan:

The current provision of pedestrian and cycling facilities across the town are unable to support and maintain sustainable travel. Much of the network is disjointed and suffers from inadequate signing, safe crossing points and poor surfacing.

In order deliver on cycling in the future, there must be a recognition of the reasons for failing to deliver on previous plans, notably the Worthing Cycling Strategy (1999) and WSCC's proposed Worthing Cycle Network (2001). A critical element on which earlier plans have foundered is a refusal to reallocate road space away from car users.

To support the aim to prioritise sustainable modes of transport, a key element in the Transport Policy must be a progressive Road Space Audit.

3.2 Errors and Omissions

The Transport Assessment does not record the lack of an up-to-date inventory of existing (physical) cycling infrastructure; nor a qualitative assessment of its safety and fitness-for-purpose. One consequence is that there is no sound basis on which to plan cycling provision for new developments.

To support the aim to prioritise sustainable modes of transport, it must be a requirement that new developments provide an accurate inventory of existing infrastructure.

The Transport Assessment states that the Worthing Cycle Network was identified in the WS Walking and Cycling Strategy, but was not prioritised within the top five to be considered for feasibility work. Two key arterial routes that would provide the backbone of a Worthing Cycle Network were prioritised and WSCC has started feasibility work on:

- National Cycle Network Route 2; George V Avenue to Sea Lane, Goring.
- A24 corridor from Worthing Town Centre to Washington; phase 1 Findon Valley to Findon Village.

To support the aim to prioritise sustainable modes of transport, the Transport Policy should commit to the development of these cycle routes.

3.3 Road Safety for Cyclists

The Transport Assessment lacks an analysis of cyclists killed and seriously injured on the roads. Modifications to junctions are discussed without analysis of accident statistics for cyclists. A cursory examination of accident mapping shows a high incidence of cycling KSIs at junctions; including locations where some off-road provision is available.

To support the aim to prioritise sustainable modes of transport, the Transport Policy must address road safety for cyclists.

REFERENCES

¹ A New Transport Vision for the Sussex Coast

South Coast Alliance for Transport and the Environment (SCATE), in association with the University of the West of England (Bristol). Available from:

<http://scate.org.uk/transport-studies/a-new-transport-vision/>

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