Hunston Neighbourhood Plan Regulation 14 – WSCC Services Officer Level Comments – July 2020

The focus of the County Council's engagement with the development planning process in West Sussex is the new Local Plans that the Districts and Boroughs are preparing as replacements for existing Core Strategies. Whilst welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies.

In general, the County Council looks for Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority.

In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals, where applicable. These documents include the West Sussex Waste Local Plan, Minerals Local Plan, West Sussex Transport Plan and the West Sussex Lead Local Flood Authority Policy for the Management of Surface Water. It is also recommended that published County Council service plans, for example Planning School Places and West Sussex Rights of Way Improvement Plan, are also taken into account.

Strategic Transport Assessment

The Strategic Transport Assessment of the Chichester Local Plan, adopted in July 2015, tested the cumulative impact of strategic development proposed within the Chichester District. The Strategic Transport Assessment identified the additional travel demand as a result of planned development, over and above development already committed plus background growth. The County Council worked collaboratively with Chichester District Council to inform the Strategic Transport Assessment and on the basis of continuous review of the work carried out, supports its conclusions.

The Strategic Transport Assessment of Strategic Development Options identified the impact of the Strategic Development Locations on the highway network through a robust transport modelling exercise using the Chichester Area Transport Model (CATM). The study methodology was agreed by the County Council and the Highways England.

The Strategic Transport Assessment identifies a package of mitigation measures consisting of improvements to junctions on the Chichester Bypass section of the A27 and smarter choices measures to encourage the use of sustainable modes of transport. The effects of smarter choices measures were modelled by applying a 5% reduction in car trips to / from the SDLs in 2031 to test the effects of development-specific travel planning and behaviour change packages. A 7% reduction in trips to / from Chichester city centre in 2031 was also applied to test the effects of area-wide smarter choices and local infrastructure measures. The study demonstrates that this package of mitigation measures is sufficient to accommodate the levels of development proposed within the Chichester Local Plan.

The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of development proposed by the Chichester Local Plan on the highway network, identify the impacts and appropriate and feasible mitigation. Mitigation measures have then been included in the Infrastructure Delivery Plan that accompanies the Chichester Local Plan. The Strategic Transport Assessment took account of the sites allocated in the Chichester Local Plan and included a forecast estimate of background traffic growth.

In considering the Neighbourhood Plan for Hunston, the size and location of proposed site allocations have been taken into account when considering if further transport evidence is required at this stage.

The overall level of development proposed in the Hunston Neighbourhood Plan is not in accordance with the forecasts of proposed development and generated traffic assumed in the Strategic Transport Assessment. However, it is accounted for in the Chichester Transport Study work undertaken to date for the current Local Plan review. This was published in December 2018 on the District Council's website. The developer would need to contribute proportionally to improvements in the area that provides mitigation to the proposed development. It is considered that no further transport study work is required to demonstrate that the development could not proceed without a severe cumulative impact under the NPPF. A full transport assessment will continue to be required to support any planning application.

The Strategic Transport Assessment indicates that over the plan period, traffic conditions in some locations are likely to worsen due to the effects of background traffic growth. If not addressed through improvements to the highway network, this could exacerbate existing congestion issues, or lead to congestion in previously uncongested locations. Therefore, as development takes place there will be a need for improvements and / or financial contributions to be secured towards the delivery of these improvements.

The County Council have no overriding concerns about the transport impacts of the Hunston Neighbourhood Plan. However, given that the pre-submission Neighbourhood Plan for Hunston includes the proposed allocation of small scale housing sites, it should be noted that site specific matters in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific matters at this stage. In considering site specific matters, please refer to the attached Development Management guidance.

The County Council currently operates a scheme of charging for highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:

http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx

Minerals and Waste

The West Sussex Waste Local Plan 2014 (WLP) and the West Sussex Joint Minerals Local Plan 2018 (JMLP) form part of the development plan for Hunston as well as the Chichester Local Plan, and as such are relevant to the Hunston Neighbourhood Plan along with the other documents mentioned in paragraph 1.1.

The Parish is partly underlain by sharp sand and gravel which is a safeguarded resource under Policy M9 of the JMLP, as well as a number of safeguarded minerals and waste infrastructure sites. Development within the parish could be subject to a minerals or waste resource assessment to ensure that viable mineral resources are not permanently sterilised, or waste sites inadvertently affected in accordance with the thresholds outlined in the Minerals and Waste Safeguarding Guidance. The Parish Council may wish to consider this in respect of the proposed Neighbourhood Plan.

General Comments

Throughout the plan there is reference to RNPPF and there is no explanation of what this stands for. Should this instead be referring to National Planning Policy Framework (NPPF)? It is requested that this is clarified and amended.

Specific Comments

Paragraph 3.8.1 – Rumboldswhyke Primary school will now be remaining open; this paragraph will need to be amended to reflect this.

Vision A – Getting Around (Page 29)

Recognition of the importance of the local Public Rights of Way (PROW) network is welcomed and a drive to upgrade these to be suitable for cyclists is important but there is no mention in here of horse riders. This area is limited in its Public Bridleway access (routes available to walkers, cyclists and horse riders) therefore by looking to upgrade public footpaths to public bridleways, rather than simply just cycle routes, will provide this much needed cycle access and offer a new facility to local equestrian users.

Policy H1 – Housing Allocation

Policy M9 of the JMLP safeguards minerals. The proposed allocation/s for housing are underlain by the safeguarded sharp sand and gravel resource. There is no reference to safeguarded minerals within the draft Neighbourhood Plan. A mineral resource assessment may be required, at planning application stage, to ensure that viable mineral resources are not permanently sterilised by development.

Reference should be made in the document to minerals safeguarding, it could be that supporting text to the policy include reference to safeguarded minerals and the requirement for a minerals resource assessment at planning application stage. Suggested additional text '*A mineral resource assessment is undertaken to ascertain whether economically viable sharp sand and gravel resources are present and whether prior extraction is practicable, as required by Policy M9 of the West Sussex Joint Minerals Local Plan.*'

WSCC's response to the Regulation 19 Chichester Local Plan Review regarding housing allocations in Hunston were as follows:

'*Any development within this area cannot currently be accommodated in the existing primary school at North Mundham. Further capacity would be required to accommodate the development, CDC will need to work with WSCC to determine how additional capacity in the area could be accommodated if land is to be allocated.'*

It remains the case that there is insufficient capacity to accommodate primary school pupils as a result of a large allocation in Hunston. WSCC request that Hunston Parish Council engage with WSCC as the Local Education Authority to ensure that any allocation though the Neighbourhood Plan would be able to provide sufficient school infrastructure before the plan proceeds further.

There is currently sufficient capacity to accommodate secondary aged pupils in the area, however this may change by the time any planning application comes forward. Contributions will be required to mitigate the impact of additional child product coming forward as a result of development.

Policy GA1 – Footpath and Cycle path Network

WSCC would reiterate the need to also consider horse riders locally so any upgrades should be to public bridleways, not just cycle routes, so pedestrian and cycle access is improved along with new access for horse riders. It is suggested the Policy could be renamed to the '*Public Right of Way (PROW) Network*' in order to encompass all modes of usage.

The Parish could look to promote improvements to existing PROW and ideally look to upgrade, where appropriate, any public footpaths to Bridleway giving users the right to access on foot, bicycle and horseback. Development on the eastern side of the B2145 could look to provide improved infrastructure and upgraded PROW where possible toward North & South Mundham providing high quality sustainable transport options for leisure purposes mainly. These may include improvement and upgrade to Public Footpath 188 linking Hunston with North Mundham and upgrade and improvement to Public footpaths 186, 82, 83 & 84 improving links to South Mundham for walkers, cyclists and horse riders.

Development on the western side could look at providing new public access routes where possible. Upgrade and improvement to Public Footpath 185 to a Public Bridleway could provide a direct route for walkers, cyclists and horse riders west toward Donnington and introduce high quality access to the south of the parish in the form of Public Bridleways.

Due to the uncertainty of schemes coming forward in the plan period, it is suggested that the identified schemes are removed from policy and either included as a Community Aim or inserted into an appendix to the plan. For example, Policy GA1 Footpath and cycle path network refers to the spending of CIL contributions which should be removed from the policy.

Proposals Map

It is not clear where the housing allocation is as the Legend is labelled incorrectly. It is requested this map is made clearer to aid in the understanding of the proposed housing allocation.