

From: West Chiltington Parish Council clerk@wcpc.org.uk 
Subject: West Chiltington Neighbourhood Plan Regulation 14 comments
Date: 26 January 2018 at 16:03
To: Debbie Jarvie planning@wcpc.org.uk, Judy Fryer (judynt@btinternet.com) judynt@btinternet.com, Marshall Monks marshall.monks@wcpc.org.uk, Maureen Chaffe processmatters2@gmail.com, Robert Gustar robert.gustar@wcpc.org.uk, Sharon Davis sharon.davis@wcpc.org.uk, Trevor Kensett trevorkensett@hotmail.co.uk, Trevor Kensett trevor.kensett@wcpc.org.uk



FYI

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The Parish Council office is normally open on Tuesday, Wednesday and Thursday from 10.00am-2.00pm.

From: Caroline West [<mailto:Caroline.West@westsussex.gov.uk>]
Sent: 26 January 2018 15:26
To: West Chiltington Parish Council <clerk@wcpc.org.uk>
Cc: Darryl Hemmings <darryl.hemmings@westsussex.gov.uk>; Kwan, Norman <Norman.Kwan@horsham.gov.uk>; Patricia Arculus <Patricia.Arculus@westsussex.gov.uk>
Subject: West Chiltington Neighbourhood Plan Regulation 14 comments

Dear Anna

Thank you for the opportunity to comment upon the Pre-Submission Neighbourhood Plan for West Chiltington.

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 and pre-2004 Local Plans. 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.

Strategic Transport Assessment

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 Horsham District Planning Framework (HDPF), adopted November 2015, tested the cumulative impact of strategic development proposed within the Horsham District in the HDPF. The study 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 Horsham 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 identified that the major impacts of the strategic development sites will be to the main junctions on the A24 and A264 around Horsham and that these impacts could be successfully mitigated by a combination of deliverable highway improvements and sustainable transport measures. Further work to develop these improvements will take place as development comes forward.

The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of development proposed by the HDPF 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 HDPF. The Strategic Transport Assessment took account of the sites allocated in the HDPF and included a forecast estimate of background traffic growth.

In considering the Neighbourhood Plan for West Chiltington, 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 West Chiltington Neighbourhood Plan is in accordance with the forecast estimate of background traffic growth assumed in the Strategic Transport Assessment. The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network that cannot be mitigated to a satisfactory level. The County Council considers that this provides sufficient evidence to justify the overall level of development proposed in the West Chiltington Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the

transport evidence before allocating the sites proposed in the Neighbourhood Plan for West Chiltington.

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 West Chiltington Neighbourhood Plan. However, given that the pre-submission Neighbourhood Plan for West Chiltington 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

Site allocations

H1 Steele Close - Access (both vehicular and non-vehicular) is a potential concern. Access would be achieved via The Juggs (public highway) and Steele Close (unadopted). As Steele Close does not form part of the adopted public highway, only advice can be provided as to the suitability. There are no issues with carriageway width or provision for pedestrians along the The Juggs. Along Steele Close, there are no provisions for pedestrians. This is not necessarily an issue in itself. However, the initial section of Steele Close is narrow along with there being an almost 90 degree bend with very limited forward visibility due to an existing fence.

It is accepted that this will be a low speed situation, the additional dwellings will though increase vehicle and pedestrian activity. Ideally, the carriageway width would be widened to enable two way vehicle movements and forward visibility improved. Alternately, the surfacing could be changed to better highlight that this is a shared surface area with pedestrians and traffic sharing the same area. At the current time, it's unclear what improvements may be achievable.

Should this site be allocated within the plan, a specific requirement must be included that requires improvements to Steele Close in order to achieve safe and convenient access to accommodate the increase in vehicular and pedestrians traffic.

Policy H1 Moto Di Marino Garage - The redevelopment of this site could enable a highway improvement in terms of providing a footway on the western Mill Road boundary. At present the existing footway on Mill Road terminates at the NW corner of the Garage site. Pedestrians then have to walk within the carriageway before the footways recommence at the Mill Road/Haglands Lane/Common Lane/The Common crossroads. The redevelopment of this site would enable a footway to be incorporated partly (so as also to be partly within the existing public highway) or entirely within the site. The provision of a footway would also potentially benefit visibility from the Haglands Lane junction northwards as it would then eliminate the potential for any obstructions against the back edge of the highway.

The allocation of this site should require the provision of a length of footway on the Mill Road western boundary either entirely or partly within the development site.

Policy Comments

Policy EH3 Green Infrastructure - This policy refers specifically to green infrastructure corridors but no reference to specific protection for the habitats / species / sites that the corridors connect. Wording should be reviewed to ensure that it is not only the biodiversity corridors that are protected but all identified green infrastructure assets in Map E. It may be considered beneficial to reference the SDNPA Green Infrastructure Framework: <https://www.southdowns.gov.uk/planning/planning-advice/south-downs-green-infrastructure-framework-informal-consultation/>

Policy EH4 Surface Water Management – A difference approach is suggested for the following reasons;

- The policy is a restatement of existing National Policy; it restates what is in: <https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3> and the policy would be improved by referring to the NPPG.
- The content of EH4.3-EH4.5 is for the most part more effectively dealt with in other adopted policies, notably the adopted West Sussex County Council Policy for the Management of Surface Water: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/47667/West-Sussex-LLFA-Policy-for-the-Management-of-Surface-Water.pdf The danger of duplicating this evidence in the Neighbourhood Plan is that it will cover some aspects but not others; e.g. there is no reference to maintenance / enhancement of water quality for drainage associated with new development and no reference to brownfield betterment. Furthermore the Neighbourhood Plan policy will not benefit from the continual review that the adopted WSCC policy undergoes by the LLFA. We are in the process of updating the Surface Water Management Policy to more specifically address incremental

management policy to more specifically address incremental development and this is expected to be completed in the spring 2018.

- EH4.4 is a dilution of existing policy; It states that: *Consideration should be given to the use of Sustainable Urban Drainage Systems (SUDS)...* Whereas the House of Commons: Written Statement (HCWS161) mandates the use of sustainable drainage for developments of 10 dwellings or more *unless demonstrated to be inappropriate.*

If, as stated in EH4.1 and 4.2, there are areas in the parish at risk of flooding from any sources (fluvial / surface water or groundwater) then it would be better to include these locations in the neighbourhood plan policy and specifically point to the requirement for sequential and exception tests to be undertaken as a pre-requisite for development.

Policy EH9 'Unlit village' status - The wording "*new lighting will be required to conform to the highest standard of light pollution restrictions at the time*" is a bit open to interpretation and does not cover the requirement if the lighting was on highway and to be adopted by WSCC PFI contract. It is requested that the wording is changed to "*Any new adoptable highway lighting will need to conform to the West Sussex County Council Private Finance Initiative (PFI) street lighting specification*" It is then requested that the link to the street lighting specification is added to supporting text in EH9.1 "*The West Sussex County Council PFI street lighting specification is available from <https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/road-agreements/> under 'Lighting of developer promoted highway schemes'*"

It is also requested that additional wording is added to EH9.1 to identify the WSCC stance on lighting in this parish "*West Sussex County Council also supports the initiative to keep lighting levels to a minimum and would not consider additional lighting that requires to be maintained under the PFI contract on the grounds of the area being close to the national park, our support for the dark skies initiative and energy/carbon usage.*"

EH12 Mineral and Hydro-carbon Extraction – This policy should be removed from the neighbourhood plan. The Localism Act (Schedule 9, 38B) sets out that "A neighbourhood development plan may not include provision about development that is excluded development". Excluded development includes "County Matters" which include minerals activities (as defined in Schedule 9, 61K). Therefore, the neighbourhood plan should not have specific policies on minerals matters.

Policy H8 Attention to detail– Point 1 refers to the bin stores needing to be agreed with WSCC. Details of the bin stores/collection arrangements would be agreed with Horsham District Council as the waste collection authority.

Policy GA3 Parking and new development – This policy seeks to set car parking standards for new residential development. The County Council's Guidance on Car Parking in Residential Developments and the Car

Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator should be referred to in the policy as the car parking standards, which can be accessed via the following link:
<https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/>

It is noted that **Policies GA1** and **LC3** identifies items to help guide any spending if CIL. It should be noted that no mechanism currently exists for prioritising infrastructure needs across different public services and allocating funds to priority projects. The County Council is working with Horsham District Council and other Local Planning Authorities to develop a robust mechanism and establish appropriate governance arrangements to oversee the prioritisation of infrastructure across different services. This will be important to secure delivery of priority projects and the County Council would welcome the Council's support for establishing appropriate decision-making arrangements.

Kind regards

Caroline West

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