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Subject: Boxgrove Neighbourhood Plan - Regulation 14

Dear Sir/Madam

Thank you for the opportunity to comment upon the Pre-Submission Neighbourhood Plan for Boxgrove. We request that these comments are considered in the preparation of the Neighbourhood plan, as previously discussed these comments are submitted outside the consultation due to the date the County Council was informed about the consultation.

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.

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. These documents include the West Sussex Waste Local Plan, Minerals Local Plan and West Sussex Transport Plan. 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.

This long section not needed for Publication stage if previously stated at Pre-Submission stage.

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 Agency.

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 Boxgrove, 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 Boxgrove 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 Boxgrove Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Boxgrove.

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

Policy comments

Policy GA2 - should refer to the West Sussex County Council Parking Standards.

Policy GA3 – It is suggested that this policy is amended in order to achieve the plans objectives, and requirement in GA1, for an enhanced cycle network within to serve new development. As set out in the policy *“Streets shall be designed to provide a minimum of a single pedestrian footway and for the maximum design speed of 20mph”, could be enhanced with reference in supporting text to a preferred approach, that where possible a shared footway cycleway (if possible segregated from traffic) is sought.*

Policy LC4 and schedule A – These identify the playing fields at Boxgrove primary school to be designated as Local Green Space. If development or expansion is required at Boxgrove Primary school Local Green Space designations should not restrict these developments, particularly considering policy LC7 of the Plan.

Policy EH3 – seeks to reinstate historic public footpaths. The Parish Council should seek to record these, or indeed other routes around the parish, on the basis of claiming unrecorded access rights from historic or user evidence; alternatively the relevant landowner may be agreeable to dedicate the route(s). Further information can be provided from WSCC PROW team on request.

There is support for the consideration of Public Rights of Way in the Neighbourhood Plan. The Parish Council are encouraged to seek to enhance their PROW network both in terms of creating new paths and increasing modal use of certain paths, e.g. up-grading footpaths to bridleways so as to allow lawful use by cyclists and horse riders. Boxgrove's bridleways are small in number and require use of road highways to connect between them. Some suggestions for paths are as follows:

- New bridleway linking bridleway 3575 with Tinwood Lane (this is a long-standing used route but is not legally recorded as a bridleway);
- Establishing a bridleway from Boxgrove village along footpath 285 (Town Lane), across the A285 using a suitable road crossing facility, and then running south-west would encourage walking and cycling use to/from Strettington and, if extended to Maudlin, would be a safer link to Chichester;
- Establishing a bridleway from Boxgrove village connecting direct to Tinwood Lane would allow future cyclists to access directly into the South Downs whilst avoiding use of the A285; and
- A new footpath running north from Halnaker Windmill to footpath 398 would provide a local circular route incorporating the attractive views from the windmill.

Kind regards

Caroline West

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