

Southbourne Neighbourhood Plan Review Regulation 16 – WSCC Services Officer Level Comments – June 2021

Thank you for the opportunity to comment upon the Submission Neighbourhood Plan Review for Southbourne.

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 and Site Allocations

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 (i.e. behaviour change initiatives and sustainable transport infrastructure) to encourage the use of sustainable modes of transport. 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 Review for Southbourne, the size and location of proposed site allocations have been taken into account when considering if further transport evidence is required at this stage.

This overall level of development proposed in the Southbourne Neighbourhood Plan Review is not in accordance with the adopted Chichester Local Plan, but is in accordance with the proposed allocation for the Parish in the Chichester Local Plan Review 2035. A transport evidence base study for the Local Plan Review was published in December 2018 on the District Council's website. This did not identify a severe residual highways and transport impact from the proposed allocation of 1250 dwellings in Southbourne. Therefore, the County Council considers it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan Review for Southbourne.

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 Southbourne Neighbourhood Plan Review. However, given that the pre-submission Neighbourhood Plan Review for Southbourne includes the proposed allocation of 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.

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

Please note that the Soft Sand Review of the Joint Minerals Local Plan has now been adopted and the new title of the plan is the *Joint Minerals Local Plan July 2018 (Partial Review March 2021)*. Any reference to the plan will need updating as such to reflect our most recent policies.

Specific Considerations

Policy SB2 Land east of Southbourne Village

Criterion (g) – The Stantec Southbourne Level Crossing Modelling Report commissioned by CDC has concluded that the level of development proposed in the Southbourne Neighbourhood Plan Review does not justify the delivery of a road bridge to mitigate the impact of the development.

Whilst the County Council does not object in principle to the delivery of a bridge, it is not required solely to prevent a severe residual impact or an unacceptable safety risk to the highway network as a result of the planned development, in accordance NPPF. **This policy criterion should therefore be presented as an aspiration rather than a policy requirement.**

If a road bridge is not achievable, there would be a need to demonstrate that the development can be delivered without it.

There may be some merit in considering a foot and cycle crossing as an alternative to the proposed road bridge. A pedestrian/cycle bridge to enable crossing the rail line on foot/cycle when barriers are down for access to village facilities and public transport could help demonstrate that the site is sustainable in transport terms. Any new crossing should be grade separated in order to cater for a wide range of users.

Criterion (s) – WSCC Welcome the addition of a criterion requiring a Waste Infrastructure Statement and a Mineral Resource Assessment. However, in order to ensure full compliance with WSCC policy in any future statement it is requested that the wording is changed to the below:

"A Waste Infrastructure Statement and a Mineral Resource Assessment is submitted *in accordance with Policy M9 of the West Sussex Joint Minerals Local Plan July 2018 (Partial Review March 2021) and Policy W2 of the West Sussex Waste Local Plan (2014) and the Minerals and Waste Safeguarding Guidance*"

SB13 Green and Blue Infrastructure Network

As part of achieving criterion B, WSCC Public Rights of Way (PROW) would welcome the following improvements:

- all existing (i.e. FP247, FP213, FP211, FP204, FP242) and new paths that match the proposed Green Ring route be upgraded to or created as Bridleways;
- the creation of any new route linking Stein Road, via Breach Avenue through the proposed development area to FP251-1 be designated a Bridleway, and
- the upgrade of FP251-1 (as listed in the IBP (IBP791) and within 5.82 of SB13) and FP251 to Bridleways providing an off-road link between Woodmancote and Southbourne and providing access to the Bridleway network north of the A27.
- Upgrade of FP257, where Bridleway rights would provide a pedestrian, cycle and equestrian route from the A259, north toward Hambrook which would connect with the potentially upgraded FP251 and north across the A27.

We understand the desire to overcome severance caused by the railway by providing crossings to the east and west of the station along the Green Ring; there is an existing crossing, slightly to the west from that shown along the Green Ring, along FP241. The Parish could consider the possibility of diverting the route of the Green Ring along FP241 and upgrading the existing crossing to a grade separated crossing.