

West Chiltington Neighbourhood Development Plan Regulation 16 Consultation – WSSC Services Officer Level Comments – November 2024

Thank you for the opportunity to comment upon the Neighbourhood Development 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. 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, West Sussex Joint Minerals Local Plan (Partial Review March 2021) 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.

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 for the West Chiltington Neighbourhood Plan.

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, it should be noted that site specific matters 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.

Minerals and Waste Local Plan

The heading of paragraph 2.12 may need to be updated because the paragraph covers both the [West Sussex Joint Minerals Local Plan \(Partial Review March 2021\)](#) (JMLP) and [West Sussex Waste Local Plan](#) (WLP).

Policy M9 of JMLP safeguards minerals. Mineral resource assessments may be required, at planning stage, for development proposals within mineral safeguarding areas to ascertain whether economically viable mineral resources are present and whether prior extraction is practicable, as required by Policy M9 of JMLP. As parts of the neighbourhood plan area are underlain by the safeguarded mineral reserves, it is recommended that reference is made to minerals safeguarding and Policy M9 of JMLP in the supporting texts for Policy H2 Land for Housing.

Suggested additional text: 'Proposals for development within a Minerals Safeguarding Area will need to accord with Policy M9 (Safeguarding Minerals) of the West Sussex Joint Minerals Local Plan. A Mineral Resource Assessment may be required prior to any development being consented, which addresses the relevant requirements set out in the West Sussex Joint Minerals Local Plan.'

Specific Comments

Policy H2a Land at Hatches Estate

The County Council suggest revising the first sentence of paragraph 3 for clarifying whether the conditions set out within the policy are all the conditions required for a development proposal to be supported.

The County Council recommend reviewing the wordings of paragraph 3(f). Provided that the western boundary of the allocated site is Broadford Bridge Road, trees or hedgerows may need to be cut back to maintain suitable visibility splays if access is to be from this Road. We advise clarifying the wordings of paragraph 3(f) to taken into account of such need.

Policy H2b Land at Smock Alley

The County Council suggest revising the first sentence of paragraph 3 for clarifying whether the conditions set out within the policy are all the conditions required for a development proposal to be supported.

The County Council recommend reviewing the wordings of paragraph 3(e). Depending on where vehicle access to the site is proposed, trees or hedgerows may need to be cut back to maintain appropriate visibility splays. We advise clarifying the wordings of paragraph 3(e) to taken into account of such need.

Policy H3 Quality of Design

The County Council suggest making reference to the standards for storage and collection of waste specified in paragraph 6.8.9 of '[Manual for the Street](#)' (published in 2007) in the supporting text for the policy.

Policy H4 Windfall Sites

The County Council would recommend reviewing the wordings of paragraph 1(e) to take into account any reasonable and justifiable exceptional circumstances. Whether and how new development can integrate with existing infrastructure and provide access to public and community transport would depend on a wide range of factors, including but not limited to the scale and location of the development, forms of access proposed, site-specific constraints and conditions. Individual development proposals would therefore have to be assessed on a site-by-site basis.

In relation to paragraph 1(g), the County Council emphasis that the appropriateness of requesting developer contributions would be assessed on a case-by-case basis, provided that the small-scale housing development of 5 or fewer dwellings might not create a traffic impact that is sufficiently significant to warrant developer contributions.

Objective 7e

Wordings of the objective statement could be reconsidered to cover different aspects of mineral extraction, including mineral extraction and processing, as well as oil and gas exploration, appraisal and production.

Policy GA1 Connection to Sustainable Transport

The County Council welcome introducing policy on supporting sustainable transport; but we would recommend reviewing the wordings of the policy to take into account any reasonable and justifiable exceptional circumstances. Whether and how new development can provide access to public and community transport would depend on a wide range of factors, including but not limited to the scale and location of the development, forms of access proposed, site-specific constraints and conditions. Individual development proposal would therefore have to be assessed on a site-by-site basis.

Policy GA3 Parking and New Development

The County Council are concerned that the requirements set out in Policy GA3 are not fully justified. The [West Sussex County Council Guidance on Parking at New Developments \(September 2020\)](#) does not provide standards on maximum parking. The local highway authority would not automatically disregard a development proposal if its parking provision failed to meet the parking demand as set out in Table 2 (Residential Parking Demand) of the Guidance. As specified in paragraph 5.3 of the Guidance, consideration might be given to varying the expected parking demand by 10% above or below to accommodate potential variations in parking demand within a Parking Behaviour Zone. As such, the local highway authority would take a balanced view in line with the Guidance and other factors including but not limited to the location of site.

We are also concerned with the requirements on reprovision of off-street parking. The local highway authority would not be in the position to insist on reprovision of off-street parking because it is different from providing parking on street and public highway. We therefore recommend reconsidering the wordings of Policy GA3 for making the requirements fully justified.

We encourage making reference to the West Sussex County Council Guidance on Parking at New Developments (September 2020) in the supporting text of the policy, alongside the County Council's Supplementary Planning Guidance.

Appendix 7 Getting Around West Chiltington – Paragraph 4.2

The County Council understand that some residents may have concerns over cycling on rural lanes. However, we recommend reconsidering whether general remarks concerning road safety would be more appropriate because we are concerned that the current remarks in paragraph 4.2 could be interpreted as discouraging cycling.

Such interpretation would not be in alignment with our active travel strategy set out in Chapter 6 the [West Sussex Transport Plan 2022 to 2036](#). Our strategy intends to address the needs of pedestrians, cyclists, equestrians, persons of reduced mobility and micro-mobility solutions which are emerging and may become more prominent during the life of the Plan.