

**West Sussex County Council – Representations on the Selsey
Neighbourhood Plan – Publication version (Regulation 16 consultation)**

March 2018

Introduction

West Sussex County Council (WSCC) submitted representations to Selsey Town Council on 31 March 2017 as part of the pre-submission (Regulation 14) consultation on the Selsey Neighbourhood Plan (SNP). These comments were not included in Appendix 1 – Regulation 14 Schedule of Comments in the '*Selsey Town Council Neighbourhood Planning Regulations 2012 (Part 5 s15) Neighbourhood Plan - Consultation Statement*' (August 2017). WSCC have therefore taken the opportunity to repeat these comments as part of the consultation on the submission version (Regulation 16) of the SNP. In addition, WSCC seek clarification on Policy 004, Policy 008 and Policy 013.

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.

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 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.

Policy 004 allocates land at Home Farm for temporary accommodation for agricultural workers. However, no detail is provided on the number of units proposed and therefore the County Council is not in a position to confirm what impact this development would have on the transport network. As the accommodation is for seasonal agricultural workers, it is assumed vehicle movements would be limited (please see WSCC's representations under Policy 004).

On the basis that there are no other allocations for residential development in the Selsey Neighbourhood Plan, the Neighbourhood Plan is broadly considered to be 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. WSCC confirm that no further strategic transport work is required, but further details will be required at the planning application stage for the proposals at Home Farm.

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

Specific comments

The vision for Selsey in 2029, as set out in Annex A, states 'Selsey will have a renewed identity as a centre for eco-tourism, walking, cycling and bird watching. This identity will be promoted around the UK and Selsey will increase its profile and therefore economy as a result.' The public survey 2012 results, also in Annex A, highlight the level of respondents that would support better pedestrian and cycle access in the area.

Other than policy 009 there is no reference to public footpaths or footways, or how the walking and cycling vision will be achieved. Further consideration of cycling, pedestrian and equestrian access through the preparation of the Neighbourhood Plan is therefore requested. A suggestion, in order to achieve the vision, could be to support better connections with neighbouring parishes, so increasing the reason for seasonal visitors to stay and travel, and thereby spend, locally; this was a goal of the Selsey Destination Management Plan. Consideration could also be given to part of the local proportion of CIL being spent on improvements to support the Neighbourhood Plan vision and development of the area.

Policy 004

Policy 004 is not clear or precise in terms of the amount of temporary accommodation for agricultural workers proposed at Home Farm. The policy needs to clarify this. It is unlikely that there will be any highway implications associated with the allocation of this site, but without understanding the amount of accommodation, WSCC cannot confirm this at this stage. Further details will be required at the planning application stage.

Policy 008

WSCC suggest that the wording for this policy is revised to: 'The principle of cross peninsular links will be supported'. The revised wording would support the principle of cross peninsular links rather than proposals which could include a wide range of different types of projects that have not been tested in terms of their suitability or impact on the environment.

Policy 013 and Appendix 1 - Selsey Infrastructure Projects of Annex A

Policy 013 relates to new retail and commercial development and sets out that it will support such development where '*The provision of such facilities delivers enhanced community facilities as identified in the Infrastructure Priorities*

list. WSCC seeks clarification on the '*infrastructure Priorities list*' - is this the list in Appendix 1 – Selsey Infrastructure Projects of Annex 1?

It is not clear how the projects listed in Appendix 1 of Annex 1 would be required as part of retail and commercial projects e.g. education projects. It would be more appropriate if this list was linked to residential development or all development.

Appendix 1 - Selsey Infrastructure Projects of Annex A – History, Design and Guidance Background Evidence

The aspirations for transport improvements in Appendix 1 of Annex A have been noted. There is a note at the bottom of the table which should be included under the table heading to make it clear that the list of projects is not approved and planned to come forward, but it is a list compiled from feedback at the neighbourhood plan consultation exercise and responses to specific consultations. The 'Development Lead' column heading should be changed to 'Possible Development Lead'. As these are aspirational and not approved projects, the development lead may be different if the projects were to be taken forward, an example being the B2145 Ferry Bend improvements that are being led by the developer, not WSCC or STC.

Annex A – History, Design and Guidance Background Evidence

When consulted on planning applications, WSCC will take into account WSCC guidance. The 'Design and Guidance' (page 41 and 42) of Annex A should be consistent with WSCC standards. Therefore, WSCC recommend the following points are updated:

- WSCC garage dimension standard is 3x6m for garages to accommodate car and bicycle storage, not 3.5m as stated.
- Regarding parking, please refer to the County Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator for residential units and Parking standards and transport contributions methodology supplementary planning guidance for nonresidential development, which can both be accessed via the following link:

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In addition, shared pedestrian and cycle surfaces should be worded as 'should, where appropriate' as opposed to 'will'.

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Appendix 1 - Selsey Infrastructure Projects of Annex A – History, Design and Guidance Background Evidence

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Annex A – History, Design and Guidance Background Evidence

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