**Matthew Burle**

**From:** Eloise Short <Eloise.Short@westsussex.gov.uk>

**Sent:** 07 September 2021 09:58

**To:** Neighbourhood Planning

**Subject:** RE: Publication of the Hunston Neighbourhood Development Plan 2019-2037

**Attachments:** WSCC Services Comments.pdf

Hi Valerie,

Please find attached the WSCC Services Comments to the Reg 16 Hunston Neighbourhood Plan.

WSCC as service provider are objecting to the allocation of 200 dwellings in the plan until further work is completed regarding highways and education provision.

Please note that these comments represent the views of WSCC as a service provider rather than landowner, and as such should be treated separately from any response you may receive from the Asset Management Team.

Kind regards,

**Eloise Short**

Planner | Planning Policy and Infrastructure | Planning Services Ground Floor, Northleigh, County Hall, Chichester, PO19 1RH Phone: 033022 27805

Email: eloise.short@westsussex.gov.uk | Web: [www.westsussex.gov.uk](http://www.westsussex.gov.uk/)

**From:** Valerie Dobson <vdobson@chichester.gov.uk> **On Behalf Of** Neighbourhood Planning

**Sent:** 15 July 2021 10:15

**Subject:** Publication of the Hunston Neighbourhood Development Plan 2019-2037 **Publication of the Hunston Neighbourhood Development Plan 2019-2037 The Neighbourhood Planning (General) Regulations 2012 (Regulation 16)**

Hunston Parish Council as the qualifying body has prepared a neighbourhood development plan, entitled Hunston Neighbourhood Development Plan 2019-2037, for their parish with the help of the local community. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

Copies of the Hunston Neighbourhood Development Plan 2019-2037 and supporting documentation are available to view as shown below:

1. All documents are available on the CDC website and, in the first instance, people are encouraged to access the documents online [www.chichester.gov.uk/neighbourhoodplan](http://www.chichester.gov.uk/neighbourhoodplan) under the entry for Hunston.
2. A copy of the documents will be made available by Hunston Parish Council by contacting the Clerk by phone on 01243 789039 or by email clerk@hunstonparishcouncil.org.uk .
3. A copy of the documents can be sent by contacting the CDC customer service team by phone on 01243 785166 or by email contact@chichester.gov.uk
4. A copy of all the documents will be made available at the CDC offices at East Pallant House and will be available to view on request through making an appointment by contacting the customer service team 01243 785166 or by email contact@chichester.gov.uk

The period for submission of representations will run from Thursday 15 July until Thursday 9 September 2021. Representations should arrive no later than **5.00pm on 9 September 2021**. All representations received will be available to view publicly.

To make representations:

* Response forms can be downloaded and filled in electronically by visiting <http://www.chichester.gov.uk/neighbourhoodplan>Printed copies are available on request from Chichester District Council and Hunston Parish Council Clerk as indicated above.

Completed response forms should be sent to:

* Neighbourhood Planning, Chichester District Council, East Pallant House, 1 East Pallant, Chichester PO19 1TY
* Or emailed to neighbourhoodplanning@chichester.gov.uk

All comments will be publicly available and identifiable by name and (where applicable) organisation. Please note that any other personal information will be processed by Chichester District Council in line with the principles and rights set out in the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act 2018, which cover such things as why and for how long we use, keep and look after your personal data.

Please note that any representations may include a request to be notified of the local planning authority’s decision under Regulation 19 in relation to the neighbourhood development plan.

Kind regards,

**Valerie Dobson**

Principal Planning Officer Planning Policy Chichester District Council

Ext: 34594 | Tel: 01243534594 | vdobson@chichester.gov.uk | Fax: 01243776766 [http://www.chichester.gov.uk](http://www.chichester.gov.uk/)



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## Hunston Neighbourhood Plan Regulation 16 – WSCC Services Officer Level Comments – September 2021

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

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 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 Hunston, 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 Hunston Neighbourhood Plan is not in accordance with the forecasts of proposed development and generated traffic assumed in the Strategic Transport Assessment. However, it is accounted for in the Chichester Transport Study work undertaken to date for the current Local Plan review. This was published in December 2018 on the District Council’s website. In July 2021, Chichester District Council concluded that the additional costs of the mitigation measures identified through the Strategic Transport Assessment for the Local Plan Review after developer contributions were removed could not be met. Updated transport study work has been commissioned by CDC, however there is currently insufficient evidence to show that the proposed allocation in the Hunston Neighbourhood Plan can be adequately mitigated by a deliverable transport strategy.

**Until further transport evidence is provided, WSCC as the Highways Authority objects to the inclusion of 200 dwellings through the Hunston Neighbourhood Plan.** This does not necessarily mean that the development could not be sufficiently mitigated, however the evidence base is at present incomplete. Our position on the proposed allocation will be revisited following the publication of the new transport study.

## Education Provision

As per our comments at the Regulation 14 stage, at this time there is insufficient capacity to accommodate primary school pupils as a result of the proposed allocation in Hunston.

WSCC’s response to the Regulation 19 Chichester Local Plan Review regarding housing allocations in Hunston were as follows:

‘*Any development within this area cannot currently be accommodated in the existing primary school at North Mundham. Further capacity would be required to accommodate the development, CDC will need to work with WSCC to determine how additional capacity in the area could be accommodated if land is to be allocated.’*

No further advice regarding the proposed allocation, to ensure that any allocation though the Neighbourhood Plan would be able to provide sufficient school infrastructure, has been sought before the plan has proceeded to Regulation 16. **At this time, as Local Education Authority WSCC object to the to the inclusion of 200 dwellings through the Hunston Neighbourhood Plan** on the basis that there is no evidence that the primary education provision can be sufficiently mitigated.

WSCC and CDC have arranged for discussions to take place in the near future regarding primary education provision in the area. Our position on the allocation may therefore change depending on outcomes of these discussions and any further work which may need to be undertaken.

## Minerals and Waste

The inclusion of requested wording in para H1.6 is welcomed, however as this is a requirement from development it is requested that this is included as a criterion in Policy H1.

## Proposals Map

As per our Reg 14 comments, the proposals map is still not clear regarding the housing allocation. The map implies the allocation is split into three separate sections, but this is not made clear in the plan content. It would be useful to include a policy map clearly showing the allocation site.