
WSSC's response.

From: Caroline West [mailto:Caroline.West@westsussex.gov.uk]

Sent: 20 October 2017 15:04

To: Parish Clerk (Plaistow and Ifold) <clerk@plaistowandifold.org.uk>

Cc: Valerie Dobson (vdobson@chichester.gov.uk) <vdobson@chichester.gov.uk>; Darryl Hemmings <darryl.hemmings@westsussex.gov.uk>; Janet Duncton <janet.duncton@westsussex.gov.uk>

Subject: RE: Plaistow and Ifold Neighbourhood Plan Notice of Regulation 14 Consultation

Dear Sir/Madam

Thank you for the opportunity to comment upon the Pre-Submission Neighbourhood Plan for Plaistow and Ifold.

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 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 Plaistow and Ifold, the size and location of the proposed site allocation has been taken into account when considering if further transport evidence is required at this stage.

The overall level of development proposed in the Plaistow and Ifold 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 Plaistow and Ifold Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Plaistow.

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 Plaistow and Ifold Neighbourhood Plan. However, given that the pre-submission Neighbourhood Plan for Plaistow and Ifold includes the proposed allocation of a small scale housing site, 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 EH6 Street Lighting:- Concern that the policy allows no flexibility. Part of the Neighbourhood Plan area falls within the SDNP, where there is an understanding that all new development within the park need not be lit unless there are extenuating circumstances, considered on an individual basis, which demand it to be lit and then only lighting which conforms to the zero upward light specification and the latest WSCC Development Standard for Highway Lighting will be considered. There is no such agreement with Chichester District Council. It is requested that the policy is changed to allow flexibility though changed wording to '*The provision of new or additional street lighting will not normally be permitted unless it is considered necessary by the Local Highway Authority*'.

Policy H1: Suggest consideration given to the creation of a Public Right of Way as part of the development to link with the local PROW network. Upgrading this and associated routes could allow for shared use to allow cyclists as well as pedestrian traffic. If so addition of Public Rights of Way (PROW) reference in the policy.

Policy H4 and T1: For residential parking provision, please refer to the County Council's Guidance on Car Parking in Residential Developments and

County, Southern Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator, which can be accessed via the following link:

<https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/>

Other comments

It is suggested that wider reference to Public Rights of Way are used through the document, an example being para 2.7 of the vision, bullet points 2 and 3 where there is reference to improvements to public footpaths and introduce cycle routes, reference to bridleways in this context is suggested should also be included. Set out below is a potential list of route upgrades/creations. Objectives in paragraph 8.1 and Aims T1, T2 and T3 could be expanded to include a broader stance on existing /creating Public Rights of Way to encompass all users.

Potential examples of route upgrade / creations:

- An upgrade of Footpath 3520 to Bridleway status would allow a link between Restricted Byway 639 and Bridleway 636, thus reducing the distance equestrian users would need to travel by road.
- The creation of a Bridleway through Kingspark Wood (utilising existing tracks, for example) would link Bridleways 636 and 566 for pedestrian, equestrian and cycle use, also creating a local off-road cycling loop for Plaistow and Shillinglee residents.
- The creation of a new footpath, perhaps in part parallel to the Dunsfold Road or using existing tracks through Ashpark Wood, would help connect Durfold Wood and Plaistow Village.
- The creation of a new bridleway linking Plaistow Village with Bridleway 635 would provide an off-road cycling or equestrian alternative for residents to and from Ifold; this could be created, at least in part, by up-grading existing footpaths.

Kind regards
Caroline West

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From: Parish Clerk [<mailto:clerk@plaistowandifold.org.uk>]

Sent: 07 September 2017 19:48

To: Parish Clerk (Plaistow and Ifold)

Subject: Plaistow and Ifold Neighbourhood Plan Notice of Regulation 14 Consultation

Dear Consultee/Stakeholder,

Plaistow and Ifold Parish Council, as the qualifying body, has prepared a Pre-Submission Neighbourhood Plan (The Plan) for the parish of Plaistow and Ifold.

In accordance with Neighbourhood Planning (General) Regulations 2012, Regulation 14, the Parish Council is undertaking the Pre-Submission Consultation on the Plaistow and Ifold Neighbourhood Development Plan. As a body that we are required to consult, we are hereby seeking your views on the Draft Pre-Submission Neighbourhood Plan.

The Regulation 14 Consultation will take place over a six-week period: commencing on Friday 8th September 2017 at 9am and ending on Friday 20th October 2017 at 5pm.

- The Draft Pre-Submission Neighbourhood Plan can be downloaded from the following link:- <https://plaistowandifoldparishnp.files.wordpress.com/2017/09/pipnp-reg14-pre-submission-online-version.pdf>
- The SEA Environmental Report can be downloaded from the following link:- https://plaistowandifoldparishnp.files.wordpress.com/2017/09/plaistow-and-ifold-np-sea-environmental-report_v1-0_180817.pdf
- Further supporting evidence documents and maps can be downloaded from the neighbourhood plan website: <https://plaistowandifoldparishnp.com/reg14-consultation/>.
- Hard copies are available on request from the Parish Clerk.

Representations should be emailed to this address or posted to the address below.

Yours faithfully,

Beverley Weddell

BEVERLEY WEDDELL
CLERK TO PLAISTOW AND IFOLD PARISH COUNCIL
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