

Reg 16 Southwater Neighbourhood Plan - WSCC Services Response

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

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, 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 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. The background growth in households in Horsham District over and above identified committed developments as at 2013 and Local Plan development allocations, was based on TEMPro and amounted to an additional 1634 homes over the period 2010-2031.

Horsham District Council are currently undertaking a Local Plan Review, which includes the preparation of a new transport evidence base study. Study work is being undertaken by Peter Brett Associates, with the County Council acting as technical advisor. The forecasting assumptions for this study are expected to include all neighbourhood plans in the District which are currently either made or under preparation.

In considering the Neighbourhood Plan for Southwater, the size and location of proposed site allocations have been taken into account when considering if further transport evidence is required at this stage.

As previously stated at Reg 14, it is considered that due to the scale and location of the proposed site allocation in the Southwater Neighbourhood Plan, the level of growth proposed is not in accordance with the background level growth assumptions in the 2013 Strategic Transport Assessment. Therefore, further cumulative transport assessment is required in order to assess if, when the site is considered together with other strategic development in Horsham District, there will be severe impacts on the transport network, which could not be mitigated to a satisfactory level, by using measures which would be feasible, viable and deliverable. Further assessment work is currently underway through the Horsham District Transport Study and is expected to conclude in late summer or early autumn for the Local Plan Review. Paragraph 108 of the National Planning Policy Framework (NPPF) sets out the areas that need to be addressed through the Strategic Transport Assessment. This assessment is required before the site is allocated for development in the Southwater Neighbourhood Plan.

A completed transport mitigation strategy, to be agreed with the Highway Authority, for the forecasted travel demand is required before the site is allocated for development in the Southwater Neighbourhood Plan.

Key Concerns on the Neighbourhood Plan Highway Capacity Assessment

- The proposed allocation is not in conformity with the adopted Local Plan and the transport forecasting assumptions used to evidence it.
- The County Council, as Highway Authority, was not consulted over the transport assessment methodology, and therefore the methodology was not agreed.
- The Capacity Assessment work undertaken by WSP for Southwater considers only the consented development of 540 homes at Southwater

alongside the proposed development of a further 450 homes; it does not consider other development which is likely to contribute to A24 traffic, (notably Land North of Horsham and dwellings at Land west of Horsham not yet built or occupied in October 2018 when the WSP traffic surveys were undertaken) and forecast changes in households and jobs across Horsham District from NTEM (this may result in a figure lower than 17% but higher than 5%).

- Therefore, the Capacity Assessment does not constitute a cumulative assessment, which looks at the combined impacts on the junctions considered from committed development.
- A negative impact is indicated at the A24/A272 Buck Barn junction. This is a key junction in the County road network between strategic routes which is of economic importance.
- If the Strategic Transport Assessment for the Neighbourhood Plan identifies an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe (NPPF 2019 Para 109), suitable and deliverable and cost-effective mitigation needs to be proposed. As required by paragraph 108 of the NPPF Sustainable transport measures should be identified and required to be delivered along with necessary highway mitigation through the allocation policy.
- The TA does not consider sustainable travel modes including whether and what improvements for public transport, cycling and walking would be necessary to conform to or better the suggested vehicular trip generation, which will be based on sites with sustainable travel plans in place.
- The trip distribution is based on travel to work; it may be of benefit to consider education trips, especially in AM separately to see if this accounts for any movements which differ from commuter trips, due to locations of schools, for example if trips would leave A24 at Farthings Hill for Tanbridge school

Until further Transport Assessment work is completed to an agreed methodology, to identify the impacts and mitigation measures in West Sussex from the proposed allocation, West Sussex County Council consider the Plan does not meet the basic conditions and is contrary to NPPF (Para 109). We would welcome further consideration and discussion with the Parish and District Councils on ways to resolve this issue.

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

Education

Comments for the Reg 14 stage of the Neighbourhood plan are repeated; the need for school places, and where necessary, the delivery of new schools, should take into account the cumulative development of an area. Strategic level planning undertaken at the District Level allows for the consideration of the

options and all other relevant planning considerations, the County Council would then expect Horsham District Council to set out planning policies that will lead to securing a suitable, serviced site(s) if required and developer contributions towards new school(s) in Horsham District.

The allocation in the draft Southwater Neighbourhood Plan alone would not necessarily require a new secondary school to be provided.

The County Council needs to consider the education provision on a locality basis and wider when considering secondary school provision. This is difficult when looking only at a neighbourhood planning area. The County Council welcomes the safeguarding of a site through the Southwater Neighbourhood Plan for education use. However, at this time no commitment could be given, without the review of the HDPF and a cumulative assessment of educational need considering future housing allocations and pupil projections.

It is noted that there is no mention in the plan, that we would expect to see, for other educational uses including early years, primary, special and youth provision.

Neighbourhood Plan

- The County Council welcome the safeguarding of land for a secondary school
- A .dwg plan of the secondary school site is requested so that feasibility work could be undertaken to ensure it is of an adequate size and there would be no obstacles or obstructions that would prevent a future school being delivered.
- Reference should be made to the need to provide sufficient provision for early years, primary school, special school or youth facilities to mitigate the development. The proposed allocation would require the developer to provide for 24 early years places.

Specific Policy Comments

SNP2 - The amendments to Policy SNP2 in respect of protection of the setting of the Grade II* Great House Farm Listed Building are welcomed. The amended policy wording put forward as Policy SNP2.2 (h) is welcomed, proposing as it does the retention of parcels of land to north and south of the Listed Building as open land, and recognising the need to maintain the existing visual inter-relationship between the Listed Building, Courtland Wood and parts of the medieval fieldscape.

Taking into account also the continued intention to respect as much as possible, for reasons of biodiversity, existing field boundaries and hedgerows along them (SNP2.2 (a)) - most of which on this site are parts of the medieval fieldscape - the amended Policy SNP2 should be a robust driver for a development sympathetic to the setting of Great House Farm as a significant heritage asset.

Parts of the site contain high seasonal groundwater levels, particularly in the westernmost area where the principal watercourse is located. For much of the site seasonal ground water levels reach between 0.025m and 0.5m of the

surface, and within 0.025m in the west of the site. These constraints should be taken into consideration in the drainage strategy for the site.

SNP2.2(c) - Comments from Reg 14 stage are repeated regarding this policy criterion; aims to improve/ upgrade walking and cycling to Christ's Hospital railway station, including the Downs Link, but there is no detail as to how this might be achieved, by whom and to what standard other than that included in SNP13.

SNP4.3 - Justification would need to be provided within the applicant's Transport Assessment as to whether the site would have a negative impact on the road network or highway safety, in accordance with NPPF Para 109. Any traffic calming would need to take into account adopted WSCC Policy in this regard.

SNP14 – Comments from the Reg 14 consultation are repeated regarding this policy; the County Council requests that the policy specifically refers to West Sussex County Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator. The standards are currently being updated and will include a requirement for EV charging points. If the parking allocations do not meet the PDC demand, it is advised that the applicant provides further evidence on how and where parking could take place.

Paragraph 7.21 SNP14.2 – Comments from Reg 14 are repeated here; this wording is not considered to be in accordance with the NPPF. In that, "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*" We suggest amending to '*Where this criteria is not met applications should be refused further justification should be provided by the applicant.*'

Paragraph 7.21 SNP14.3 – As above, comments from Reg 14 are repeated here; this wording is not considered to be in accordance with the NPPF. In that, "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.* It is worth investigating if parking could be accommodated on-street within the development. We suggest amending to '*Where a proposed development would result in the loss of a garage, the application will be refused unless the applicant should provide an evidence of alternative parking elsewhere within the curtilage of the dwelling.*'

SNP15.1 - WSCC support this policy. As stated above, it is intended that WSCC will have an adopted standard for electric vehicles and infrastructure in the near future.

SNP22.1 – It is suggested that the following wording is amended - '*Proposals for the provision of telecommunication infrastructure will be ~~approved~~ supported where they do not have an unacceptable impact on residential amenity*'

SNP22.2 – WSCC support the amendments made to this policy to ensure all new buildings and refurbishments benefit from full fibre technology.