

Dear Ms Crawford

Thank you for the opportunity to comment upon the Pre-Submission Neighbourhood Plan for Stedham and Iping.

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 South Downs Local Plan Preferred Options, tested the cumulative impact of development proposed within the National Park (Scenario 1: Local Plan Preferred Options) and an additional scenario which tested a higher housing number (Scenario 2: Medium Housing Target + 60%). A further assessment has also been made of the impacts of a revised distribution of development in Midhurst and Easebourne. The County Council has worked collaboratively with SDNPA to inform the Strategic Transport Assessment along with the additional assessment and on the basis of continuous review of the work carried out, supports its conclusions.

The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of development proposed by the South Downs 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 South Downs Local Plan. The Strategic Transport Assessment took account of the sites allocated in the South Downs Local Plan and included a forecast estimate of background traffic growth.

In considering the Neighbourhood Plan for Stedham and Iping, 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 Stedham and Iping 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 Stedham and Iping Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Stedham and Iping.

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 Stedham and Iping Neighbourhood Plan. However, given that the pre-submission Neighbourhood Plan for Stedham and Iping includes the proposed allocation of small scale housing sites, 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 SINDP7 Stedham Sawmills

Page 17 at bullet point ix states that, "*The existing vehicular access should be suitably improved for use by occupants of all buildings. There should be no new vehicular access to School Lane;*". The Highway Authority have no in principle issues with this arrangement and welcome that access is being provided from School Lane to ensure suitable connections to the village. It does appear that the site currently benefits from an access from the A272 and clarification should be provided as to what the future use of this access to the site is.

Reference is also made on page 17 to car parking provision at bullet point x. Any future planning application should refer to the WSCC Guidance on car parking in residential developments and car parking demand calculator, which is available here, <https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/>.

Support is given for the recognition in the policy that development will mean increased demand for the public paths around the current sawmills. As well as (vi) of the policy, it would be appropriate to improve existing footpath surfaces and upgrade to allow cycling, which could assist suitable travel and connections to Midhurst.

It is uncertain what route is referred to in SINDP7vi, as there is no public right of way (PROW) immediately north of the site, rather there is School Lane as public maintainable highway. If it is intended to refer to bridleway 916_1, this could create a good cycle route leading from the development north of the A272 and away from the common. This bridleway, also bridleway 1132 further north that is a well-used route connecting Iping and Stedham, would benefit from improvement for local residents' health and wellbeing, connectivity and links to local businesses.

Policy SINDP8 – Land west of West Lodge

Page 18 with regards to references made to parking the comments above in relation to using the WSCC Guidance on car WSCC Guidance on car parking in residential developments and Car parking demand calculator stand.

This proposed development will increase demand for use of bridleways 916_1 and 1132; again, it would be appropriate to improve the path surfaces for this increased demand and for users' convenience and enjoyment. Additionally a new cycleable path linking the entrance to the development from School Lane directly north along the drive to connect with bridleway 1132 would be valuable.

SINDP 20 - Permissive and Public Rights of Way

Page 34 refers to having two National Trails running through the parish. West Sussex has only one National Trail running through the county, the South Downs Way. The draft Plan is believed to refer to two locally promoted routes, the New Lipchis Way and the Serpent Trail.

The draft Plan refers to a desire for existing PROWs to be cleared and for new routes. It would be possible for the parish council to work with WSCC, maybe to set up a local volunteers group and to work to create new access rights. The parish will receive CIL monies in future and these could be allocated to improving and enhancing off-road access within the parish. Potential new routes or up-grades will require the support of landowners but a number of possibilities exist; for example:

connecting National Trust land from footpath 1128 – a new route going west from Woolbeding bridge and crossing the River Rother could be achieved; various existing footpaths could be upgraded to bridleway to provide safer connections for cyclists and horse riders. Upgrading footpath 1144 north of Hammer Lane could allow riders to avoid a potentially hazardous road route. Upgrading footpaths 1134 and 1135 to bridleway would do similarly and make a better connection to users of bridleways 915 and 3343 south of the A272; the sightlines of bridleways 3342 and 3343 can presently be obscured by road signage, vegetation and a bus stop. Works to improve the sightlines should be easily achievable.

In the event the parish seeks to design and deliver any such schemes, it is encouraged to develop proposals with both WSCC (as local highway authority) and the SDNPA.

The parish may like to consider information provided previously to the parish council regarding the powers available to parish councils for undertaking their own works on PROW (copy attached).

Policy SINDP21 Car Parking

Within the supporting text to this policy on page 35, reference is made to addressing existing parking issues within Common View and School Lane. WSCC wishes to clarify that through the planning process development can only be required to address the specific impact they are having and not existing problems un-associated with the potential impact a development may have. However, it is noted that in this instance the intention is that this work could be funded by CIL and any works to the highway would have to be in conjunction with WSCC as the Highway Authority.

In terms of the specific policy wording point 1 seeks to ensure that there will be no increase in on-road parking. Whilst there are no issues with the proposed parking requirements it is suggested that the wording is amended and the underlined text included, *"New development must provide adequate off-street (i.e. not on the public highway or any private access road) car parking spaces to meet its needs to ensure there will be no significant increase in on-road parking as a result of the development."*

This is because it would not warrant a reason for refusal if a small level of overspill car parking occurred from the new development.

It is suggested that the wording for bullet point 2 should be amended to read, *"2) No development will be permitted which significantly reduces the existing provision of on or off-road parking within the Parish."* As above, the highway authority would not be able to support a reason for refusal if it resulted in a small loss of on-street parking.

Policy SINDP 22 Maintaining and Improving Accessibility

Policy text in the fourth bullet point states that developments that reduce the accessibility for pedestrians and/or cyclists will be refused. Some context should be provided with regards this policy, that development proposals on these grounds should only be refused where the impact is severe as per the wording in paragraph 32 of the NPPF.

Kind regards

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