

Ford Neighbourhood Plan Review Regulation 14 – WSCC Services Officer Level Comments – September 2023

Thank you for the opportunity to comment upon the Pre-Submission Neighbourhood Plan Review for Ford.

The focus of the County Council's engagement with the development planning process in West Sussex is new Local Plans that the Districts and Boroughs are preparing. 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 Management Plan, are also taken into account.

Strategic Transport Assessment and Site Allocations

The Strategic Transport Assessment of the Adopted Arun Local Plan, tested the cumulative impact of strategic development allocated within the Adopted Arun District Local Plan. The Strategic Transport Assessment and its subsequent updates have identified the additional travel demand as a result of planned development, over and above development already committed plus background growth.

The County Council has supported Arun District Council with the preparation of the Strategic Transport Assessment and consider that, subject to delivery of various mitigation measures, the proposed strategic developments could come forward without leading to severe impacts on the transport network.

The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of development proposed by the Adopted Arun 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 Adopted Arun Local Plan. The

Strategic Transport Assessment took account of the sites allocated in the Adopted Arun Local Plan and included a forecast estimate of background traffic growth.

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

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 Ford Neighbourhood Plan Review. 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.

Minerals and Waste

The heading of para 2.5 may need updated as it covers both the Minerals and Waste Plans. The West Sussex Minerals Plan was partially reviewed in 2021; the parish may wish to reflect the most recent version - [West Sussex Joint Minerals Local Plan 2018 \(Partial review March 2021\)](#) (JMLP). The Parish may also wish to reference the waste site allocation in the Parish contained in Policy W10 of the [West Sussex Waste Local Plan](#).

General Comments

National Planning Policy Framework (NPPF) has been updated since the last iteration of the draft Plan was published, most recently in September 2023. The Parish may wish to ensure that paragraph numbers are still relevant throughout the plan. For example, Policy EH4 (although saved) contains references to NPPF

which are now out of date; chapter 10 of NPPF now related to high quality communications infrastructure.

The background evidence does not contain any surface water flooding maps alongside fluvial flooding maps. It is suggested that surface water flooding is considered in policy preparation so all forms of flood risk can be properly considered.

Specific Comments

Para 3.34

There are now two bus routes serving Ford, Stagecoach now operate the 500 service between Chichester and Littlehampton.

Policy LC7 - Contributions to new infrastructure and facilities

The requirement for 100+ parking spaces to serve a 600sqm community facility is a substantial overprovision of parking in comparison to the [WSCC Parking Guidance](#). If the community centre is intended for local use, then overprovision of parking could encourage unsustainable travel behaviours, whereas encouraging cycling and walking to the site would be consistent with other policies in the Plan. The provision of this number of parking spaces also appears to be inconsistent with other policies in the Ford Neighbourhood Plan (GA2) as well as Arun District Council's [Non-Residential Parking Guidance](#). WSCC request that this policy element is reviewed in order to be more consistent with guidance and policies for parking and sustainable and active travel.

Policy GA1 – Footpath, bridlepath and cycle path network

The requirement to screen and fence access routes from existing properties is overly prescriptive and could be unachievable. For example, where a footpath adjoins a driveway or a location with no boundary features, screening or fencing would be unrealistic. It is requested this policy requirement is amended to instead take into account impacts of enhancements or alterations on neighbouring property and mitigate any impact where necessary.