

Bramber Neighbourhood Plan Regulation 14 – WSCC Services Officer Level Comments - October 2019

Thank you for the opportunity to comment on the Regulation 14 Bramber Neighbourhood Plan.

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, Joint 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.

Minerals and Waste

Page 7 sets out the relevant development plan documents with which the neighbourhood plan should have regard to. The [West Sussex Waste Local Plan 2014](#) (WLP) and the [West Sussex Joint Minerals Local Plan 2018](#) (JMLP) form part of the development plan for Bramber as well as the Horsham District Planning Framework and the South Downs Local Plan; as such the Waste and Minerals Plans should be mentioned alongside the Local Plans for Horsham and the South Downs.

Specific Comments

Policy B4 - Point g. refers to provision of infrastructure for adequate electric vehicle charging points. Reference should be made to [West Sussex Residential Parking Guidance](#) Principle B (4.7 & 4.8) whereby 'Active' charging points should

be provided as minimum 20% of all parking spaces with ducting provided at all remaining spaces to allow for future upgrading.

Para 7.18 - Presently there is a public footpath running on the river's western embankment; to provide for additional modes the path would need to be upgraded in status to bridleway and suitably improved in surfaced width, and Bramber PC is encouraged to work with WSCC to deliver this. This could be supported within the Parish's IDP.

Figure 8.1 - Figure 8.1: this omits a couple of existing PROW – bridleway 2078 and footpath 2933 (south from the A283 crossing).

Para 8.6i – The Highways Authority has no evidence that this crossing is dangerous as currently worded. It is therefore requested that the word 'dangerous' is removed;

'Upgrade of the existing, ~~dangerous~~ uncontrolled crossing on the A283 at Castle Lane...'

Para 8.7 - It should be noted that each development will be assessed on its own merits, including whether pedestrian/cycle links and/or contributions are necessary and acceptable. This paragraph proposes that new major development contributes towards the financing of expanded services. This point is considered vague; is this referring to the upgraded crossing to be funded by developers, as stated in Policy B10 part 3? Any contributions from development would depend on location and context of development sites as to whether contributions would be acceptable and that this would be an appropriate mechanism of delivery.

Para 8.8 – Reference is made to car parking on The Street causing hazards to road users. This claim should be substantiated by evidence.

Policy B11 - point 1 refers to any proposal that would result in loss of publically available off-street car parking must provide equivalent number of spaces in accessible location. It should be noted that whether this is acceptable or not is a matter that would be assessed on a case by case basis and it may not be a requirement in highway safety terms. The highway authority would not be able to support a reason for refusal if it resulted in a small loss of on-street parking. We suggest the following change in wording;

*There will be a presumption against the loss of publicly accessible car parking in Bramber parish. Any proposals that would result in the **significant** loss of existing publicly available off-street car parking spaces **will not be supported.** ~~must~~*

~~provide at least an equivalent number of spaces in an equally accessible location.~~

Section 12 – Clarification should be provided as to whether the schemes identified within the Parish IDP are policies or aspirations.

It should be noted that no mechanism currently exists for prioritising infrastructure needs across different public services and allocating funds to priority projects. The County Council is working with Horsham District Council, the South Downs National Park Authority and other Local Planning Authorities to develop a robust mechanism and establish appropriate governance arrangements to oversee the prioritisation of infrastructure across different services. This will be important to secure delivery of priority projects and the County Council would welcome the Council's support for establishing appropriate decision-making arrangements.