**Chichester District Council: Southbourne Allocation Development Plan Document Reg 18 Consultation**

**West Sussex County Council Officer Level Response – December 2024**

This note sets out West Sussex County Council’s (WSCC) officer level response to the consultation on the Southbourne Allocation Development Plan Document (DPD) and associated documents. It highlights key issues and suggested changes to which Chichester District Council (CDC) is requested to give consideration.

We will continue to work with CDC in the preparation of the Southbourne Allocation DPD regarding WSCC service requirements in order to mitigate planned development, as it evolves.

**Minerals and Waste**

Reference should be made to the Joint Minerals Local Plan, 2018 (Partial Review, 2021) – JMLP and the West Sussex Waste Local Plan (2014) - WLP.  All three development scenarios fall within the sharp sand and gravel Minerals Safeguarding Area (MSA) and any proposals within the MSA will need to accord with Policy M9 (Safeguarding Minerals) of the JMLP and the associated Minerals and Waste Safeguarding Guidance.  Any policy relating to development in these locations will need to include a criteria/development principle to ensure the safeguarding of minerals is taken into consideration.

Policy W23 (Waste Management in Development) of the WLP also requires the design and layout of new development to complement sustainable waste management and this should also be reflected in the DPD.

**Education**

**Appendix A: Assessment Framework: Education** (Pg 23) Reference is made to the potential expansion to Bourne Community College, *including its sixth form*. It should be noted that there is not a sixth form at Bourne Community College, and reference should be amended.

**Public Rights of Way**

**Scenario 1:** Challenges may include the need to divert existing PRoW and, as a minimum, the landowner would need to grant permissive cycle rights (along with improvement works) over PRoW that fall within the proposed green circle route. Internal routes should:

* consider the continuation of Footpath (FP)241\_2 should any new bridge replace the existing railway crossing otherwise it leads to a dead end, and
* links with FP243\_1 which links the site with Park Road to the east.

FP240 and FP3591 would also require surface improvements to mitigate against increased use.

**Scenario 2:** this scenariodoes not require any diversion of PRoW but again, the landowner would need to grant permissive cycle rights as a minimum, if not full bridleway rights and deliver surface improvement works over affected FP247.

This scenario offers the opportunity to seek landowner permission to consider upgrading the remainder of FP247 northwards both within the site and north of the A27 to link in with the bridleway network within and beyond Westbourne parish.

**Scenario 3:** All above comments apply.

**Transport and Highways**

The consultation is for potential development in a broad location. In most cases when a site is identified for allocation there is usually some proportionate technical background work undertaken to justify the allocation and identify what critical and essential mitigation will be needed as part of the development. In this case there is no site-specific technical work associated with the options, thereby making it difficult to make detailed comments. Technical assessment of the options should therefore take place before a preferred option is selected. The county council would welcome the opportunity to give pre-application advice to the site promoters on the highways and transport impacts of development.

In the absence of any technical work on transport impacts of the options, it is difficult to comment on the acceptability of a multi-modal bridge, to serve 800 homes, or whether any of the options are preferable from a transport perspective. There may be some unintended consequences with the delivery of a bridge across the railway which may open up the north / south route as a rat run to avoid congestion; for example, between B2146 and A259. This will need to be taken account of in any transport assessment. Therefore, if any of these options are taken forward, there will need to be a detailed transport assessment to determine whether a road bridge is acceptable.

In addition, there is also a need to understand whether a road bridge would be financially viable. A road bridge at Southbourne is not identified as a priority for investment in the West Sussex Transport Plan 2022-36 to address transport issues, so it would need to be developer funded and delivered.

We would also draw your attention to the following:

**Vision:** In order to access some services, there will be a need to travel beyond Southbourne. The West Sussex Transport Plan advocates a vision-led approach to development planning that prioritises sustainable modes of transport and plans to achieve a high sustainable transport mode share for the location and type of development. The county council considers the vision for access/ movement should make reference to using the existing railway station and A259 as main access routes with enhanced bus and active travel facilities to enable sustainable travel behaviour.

**Para 5.8** refers to a multi modal bridge being required to address traffic congestion if 800 homes approx. were delivered. The wording within this paragraph appears a little open.  The provision of a multi-modal bridge will have a significant cost implication for any development/s as well as a sizeable footprint impacting potential on the scale of development that will be achievable.  There is the further concern that a single development may not come forward that may then be required to deliver the bridge; as has already been the case, with there being a number of permitted development parcels within areas forming part of the potential allocation that have come forward without needing to contribute to or provide the bridge.

It is also unclear whether both level crossings would be closed, if so what is the impact on north / south walking and cycling journeys. CDC should work with Network Rail to ensure that any changes to the level crossings that would be needed as a result of the development are understood at an early stage and can be taken into account in planning the site and associated infrastructure.

There should be much greater clarity on whether or not a bridge will form part of the development and the means by which it will be delivered.

**Para 5.13** The potential for two separate bridges is referenced; one for pedestrians/cyclists and potentially another for all modes.  The financial viability deliverability of the bridges again needs to be considered.  Due consideration should be given to the likely footprint required for a bridge with ramps that meets Inclusive Mobility guidance.

**Para 5.19** In answer to Q4, whilst the operation of the existing crossing is a matter for Network Rail, it’s not clear how a comprehensive and cohesive development to the existing part of Southbourne south of the railway could be created without an appropriate and safe link across the railway.

**Para 5.30** Inlands Road is narrow in places with discontinuous footways.  Inlands Road would not be suitable in highway terms to accommodate any additional significant levels of development as proposed within the DPD.

**Para 5.31** If South Lane is to be used, there will need to be some certainty in terms of what improvements are necessary and deliverable to accommodate the level of traffic envisaged from the proposed allocated development.

**Para 5.43** The main concern with this option is the ability of the existing highway network to accommodate the proposed additional traffic.  Concerns have already been raised by other parties (namely Network Rail) or are alluded to within the submitted DPD document.  There is concern also regarding the ability to comprehensively master plan the development to ensure suitable connections between parcels as well as infrastructure (i.e. the railway crossings) are provided in a timely manner.

**Appendix A: Assessment Framework**

Comments on this document are as follows:

**Para 3.12 / Q13** The DPD must include a very clear mechanism concerning the delivery of any new or improved railway crossings.  Reference is made regarding the road bridge to significant financial contributions.  If the new/improved railway crossings are deemed essential to the proposed allocation, these must be provided by the developer to enable these to be delivered in a timely manner.  The need for contributions towards this infrastructure is therefore irrelevant.

Active travel aspirations should be consistent with the West Sussex Transport Plan which promote active travel strategies to improve connectivity around the Bourne area and beyond. The ChEm route active travel improvement is expected to play a significant role in achieving this; any proposed development should include connections with the ChEm route.

Extension to bus services should also be agreed with relevant operators especially where this involves commercial services.  The need to design road infrastructure to accommodate potentially two-way bus services is a significant element to include within any master plan.  Infrastructure improvements to existing stops on the A259 could still otherwise be referenced in the DPD.  This could include the provision of cycle parking alongside bus stops.  The provision of cycle parking would in some way assist in overcoming any excessive walking distances from parts of the allocation to existing stops on the A259.

Within ‘Cycling’, this should be broadened to include improvements to cycle routes on the A259 too.  The wording included is a little unclear as to whether this is meant or not.

**Chapter 5 Assessment Framework**

*Reduce the barrier effect of rail tracks:* as well as benefits consideration should be given on how to reduce any unwanted side effects such as the attraction of through traffic.

*Support delivery of a community hub - a ‘Heart for Southbourne:* consideration should be given to the use of an accessibility tool to compare walk distances for users of the facilities resident in the development and existing village residents who would use the new facilities.

*Support local employment opportunities:* consider the overall impact of each option on minimising distance to travel for commuting and maximising the proportion within normal walking and cycling distance.

*Influence of vehicular bridge on traffic congestion:* consider also if there would be any changes elsewhere by some existing traffic choosing to re-route, such as that to Westbourne.

**Para 6.1/Q15** With respects to the following points within the table, the following comments would be made,

‘*Potential for a bridge crossing the railway for pedestrians and cyclists*’: The various scenarios refer only to the potential to deliver land for a bridge; the assessment does not refer to delivery of the bridge itself.  The development scenarios should be required to deliver the bridge.

‘*Potential for a bridge crossing the railway for vehicles*’: Similar comments would be made to those made above with references to land but not delivery of the bridge.  It’s noted that two of the scenarios would potentially not allow for a vehicular bridge in any case.

‘*Influence of a vehicular bridge on traffic congestion*’: No detailed transport work appears to have been undertaken to demonstrate the requirement for a bridge or demonstrate what benefit this may have.  In principle, a bridge may assist but this is as yet unquantified.

‘*Development within 400m of a bus stop*’: 400 metres is a useful guide for walking distances but it should not be viewed as an absolute upper threshold.  Longer direct walking routes to bus stops may still be acceptable.  Direct cycle routes to bus stops may also enable services to be accessed.

‘*Deliverability (viability) considerations*’: The delivery of the bridge must fall to the developer; WSCC would not accept s106 contributions and the associated risk of delivering a bridge associated with this development.  This should be factored into the assessment.

**Para 6.10** There is concern on the reliance on the vehicular bridge with the ability to deliver which has not seemingly have been tested.

**Para 6.11** There would appear to be apparent issues with the ability to deliver the road bridge due to the recent planning application.  There is no transport evidence to suggest whether or not a bridge is required.  The is a concern in terms of connectivity if a bridge is not provided, particularly to existing bus services on the A259 and potentially to other services within the village.  This in turn may force reliance on the use of the private car.

**Para 6.12** The concern with this option is the potential accesses onto rural lanes north of the railway and the ability for these to be improved to safely accommodate increased traffic alongside other non-vehicular road users.  Similar to the other options, there is no transport evidence to demonstrate the impact on the highway network in the absence of the road bridge.

**Paras 6.20, 6.21, 6.22** For all options there are clear deliverability issues linked to the bridge.  As noted above, there is no transport assessment having been undertaken for any of the scenarios to demonstrate the consequences for or against providing the bridge.  It seems fundamental to understand whether any of the development scenarios are deliverable either with or without a bridge in place.