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West Sussex Local Access Forum



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Sent by email to: planningpolicyconsultation@communities.gsi.gov.uk

Dear Sirs

WSLAF response to the consultation on the revised draft text of the National Planning Policy Framework

I am responding to the above consultation on behalf of the West Sussex Local Access Forum (WSLAF).

West Sussex Local Access Forum (WSLAF) is an independent advisory body, established under the Countryside and Rights of Way Act 2000, to give access advice to local authorities, statutory organisations and non-government organisations. In giving that advice, the Forum's main objective is to ensure the existing network of public rights of way (prows), as well as the wider access network, is protected and where possible enhanced. The Forum has a balanced membership of knowledgeable and experienced users (walkers, cyclists, horse riders and carriage drivers), landowners and other interests (including conservation, disabled access, landscape). For further information about the Forum please visit www.wslaf.org.

The Forum would reiterate its comments from the original NPPF consultation that it is important that the planning system protects the environment whilst encouraging sustainable development. Existing and new communities need a strong and robust network of public rights of way (PRoW) and other access opportunities around and through new developments and into the wider countryside.

Good access infrastructure (PRoW) networks which are safe and enjoyable to use, can provide a significant contribution to the rural economy, through tourism and recreation related industry. Access to nature and the countryside has proven benefits for the nation's well-being and health.

West Sussex is undergoing a period of extensive development, with many existing communities being expanded. It is important that proper regulation and policies continue to be in place to ensure high quality development that is not detrimental to surrounding environments.

All development whether large or small brings greatly increased traffic onto local roads, which frequently have to be used by walkers, cyclists and equestrians to link fragmented PRoW. This means that non-motorised users (NMUs) are feeling increasingly unsafe due to the speed and volume of traffic when using these roads, resulting in even more fragmentation, and this is especially true for multi-use (bridleway) paths, which can be used by all vulnerable road users.

There is an urgent need for more off-road multi-use paths that link into the PRoW network, providing safety for all vulnerable road users, and it should be a requirement for new development to provide this, at a minimum with a bridleway around the fringe, which links into the wider countryside. Access should be included as 'a reason for refusal'.

WSLAF's comments on specific paragraphs of the Draft framework are:

Strategic policies

Para 20: Forum members remain of the view that one of the strategic priorities should include 'recreation, access and PRoWs', which could fit into either bullet points e) or f).

Pre-application engagement and front loading

Para 41: Members very much support pre-application engagement, and in the case of strategic development (500 or over dwellings), feel it would be helpful to encourage the inclusion of Local Access Forums (LAFs), in order to ensure the protection and enhancement of access and PRoW.

Supporting a prosperous rural economy

Para 85: Along with walking and cycling, the Horse Industry is a significant contributor to the rural economy, and it is on the urban fringe and in rural areas that you will find most equestrians. So it is disappointing that when this paragraph states "*it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)*", that equestrians are omitted, when as they are also "vulnerable road users" (contributing to the economy) they should not be.

Promoting healthy and safe communities

Para 92c: enabling and supporting healthy lifestyles is supported but the accessible green infrastructure should be linked to the existing rights of way network. Encouragement should be given not just to walking and cycling, but also horse riding and carriage driving, amongst other healthy outdoor pursuits.

Open space and recreation

Para 99: the protection and enhancement of PRoW and access is welcomed and supported but the better facilities and links should be for all non-motorised users (NMUs), not solely for walking and cycling. Local Walking and Cycling Plans may exclude some users of the networks.

Promoting sustainable transport

Para 103c: the opportunities to promote access and public transport use should be for all NMUs;

Para 105d: The provision of high quality networks and support facilities is welcomed and supported, but should be for all NMUs to maximise access. The promotion of sustainable transport should not exclude equestrians from routes, as they are also recognised 'vulnerable road users'.

Considering development proposals

Para 110c: developments should provide multi-use links to the existing PRoW network.

This letter constitutes formal advice from the West Sussex Local Access Forum. The Ministry of Housing Communities and Local Government is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this Local Access Forum in carrying out its functions.

Thank you for considering WSLAF's comments. Members look forward to being updated on progress on this matter, and would welcome being consulted in the future on any similar matters that may impact on access.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jane Noble', with a long horizontal flourish extending to the right.

Jane Noble, Forum Officer
West Sussex Local Access Forum

Copy for information to: All WSLAF members