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# West Sussex Local Access Forum



12.8.2019

Sent by email to:

High Weald AONB Partnership

Dear Sir/Madam

## **Re: Design Guide for new Housing Development**

I am responding to the above consultations on behalf of 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](http://www.wslaf.org).

1) The Introduction to the Design Guide (page 2), states it is aimed at ensuring new development designers, developers, highway engineers and planning decision makers 'capture the essential character of the High Weald' at every stage. This is an aim WSLAF would very much agree with and support, especially as regards giving clear, succinct, practical and consistent advice on design expectations.

As the Forum's main remit is to "ensure the existing network of PRow and the wider access network is protected and where possible enhanced", it is encouraging to note, also in the Introduction, the reference to the High Weald AONB Management Plan 2019-2024.

This document clearly sets out (more so than in the Design Guide), the "top 5 issues relating to 'routeways' (pages 38 & 39), their particular importance, current and historical value, and the value of the connectivity of woodland and 'wooded routeways' (page 40). We welcome the reference to PRow and their reduction in accessibility' (page 60), which is a matter of great concern to us, and welcome the reference to reducing speeds on all roads (page 63).

2) The Development Challenge (page 3) - states that the scale of housebuilding in the High Weald AONB is at unprecedented levels, which will undoubtedly result in increasing numbers of vehicles on the roads. Many of these are country lanes used extensively by Non-Motorised Users (NMUs), walkers, cyclists and equestrians, as links in the presently very fragmented PRow and access network.

The National Planning Policy Framework, para 98 states *'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks.'*

The promotion of safe and connected access in new developments for all vulnerable road users (walkers, cyclists, equestrians) is a WSLAF priority, and although the Design Guide does address these issues, the Forum does not consider the terminology used, especially in relation to PRow and their status (footpath, bridleway, byway), is set out clearly for the intended users of the Guide.

We have made particular comments as follows:-

3) Chapter 2; Understanding the High Weald (page 5) – Routeways – It is appreciated that AONB documents have habitually used this terminology, but Members feel it does not meet the Aim of giving clear advice, and is considered confusing. The explanation of the term as 'a dense network of historic routeways (now roads, tracks and paths)', is felt to be insufficient and not technically accurate. Most, if not all, of the 'tracks and paths' will be PRow (footpaths, bridleways, or byways), and if the intention of the document is to give 'clear, succinct, practical and consistent advice' to planning decision makers, then all these paths should be referred to by their correct status.

The definition used in 'Routeways' also seems less clear than that in 'Other qualities' on the same page, which refers to 'the ability to get close to nature through the myriad of public rights of way.'

In our view the present PRow will naturally reflect the ancient character of the High Weald. Development Plans should show an awareness of the existing PRow network, and how new developments will interact and connect with it so as to provide improvement.

4) DG1: Responding to Site and Context (page 10) – The requirement for a robust Design & Access Statement is supported. This should incorporate all PRow (and their status), within the proposed development and in the wider countryside, to enable an assessment of the opportunities to provide connectivity and improvement (possibly by upgrading of PRow) both within the development and to the wider access network.

DG1: Responding to Site and Context (page 11) – Checklist – the requirements to analyse the site and wider landscape in relation to 'routeways', and study historic maps to identify opportunities for reinstatement of 'routeways' is supported, but clarification of the terminology is recommended, i.e. use wording PRow.

5) DG2: Connecting beyond the Site (page 14) – Connected streets, lanes and routeways – The aims of this section are supported but again the use of the term 'routeways' is considered unhelpful without clarification. The opportunities for all Non-Motorised Users (NMUs) to connect to historic routes should indeed be maximised, ideally by safe off-road routes.

DG2: Connecting beyond the Site – Designing for Walking, Cycling and Active Lifestyle – Whilst we would support the statement that walking and cycling are extremely important within the High Weald, it is essentially a rural area (page 5, 2<sup>nd</sup> para), and because of this supports a large number of equestrians. These riders contribute to the local rural economy in many ways, and they are also recognised by the Department for Transport (DfT) as vulnerable road users. It is surprising (and disappointing) there is no mention of them in this document, even though bridleways are referred to which they

can legally use. Designs should maximise opportunities for safe off-road routes for all NMUs (including equestrians).

DG2: Connecting beyond the Site – Permeability – Connectivity both through and around proposed developments into the wider countryside is supported. The greatest public benefit can be derived through improving the off-road PRow network.

The West Sussex Rights of Way Management Plan 2018-2028 states '*A starting point for new schemes will be to consider who can benefit from a new route, such as walkers, cyclists, horse riders and the disabled, and be inclusive as possible, often the aim will be to achieve at least bridleway status.*'

Safe NMu use should be prioritised within developments to improve permeability. Paths should not be adjacent to roads unless no alternative is possible. More positive statements to separate paths and roads within formal streets is recommended, with paths being multi-user wherever practical and possible. The provision of 'twitchen' style lanes can maintain and improve connectivity with PRow.

DG2: Connecting beyond the Site (page 15) – Checklist – agree and support wording regarding identifying existing routes, maximising opportunities to connect to these reinstating lost routes, and adding new routes. However, Members feel there is a need to clarify this refers to PRow.

DG2: Connecting beyond the Site – Forming Site Edges and Transitions – The use of green infrastructure on the fringes of development is supported, which ideally could include a multi-user PRow as a green corridor. This will improve the network's connectivity, and bring benefits for safety, leisure and recreation, health and wellbeing, wildlife and biodiversity.

6) DG3: Layout & Structuring the Site (page 18) – Street Character – The advice that in order to reflect the traditional character within the AONB grass verges could provide a soft edge to roads, may require NMUs to use the carriageway which may deter some users. All new roads should be safe to use.

Reference has been made to footpaths and cyclepaths going through developments improving permeability. Clear and accurate terms should be used for all these paths and maximum benefit to the public can be obtained by using multi-user routes. Junctions between paths and roads need to be safe.

DG3: Layout & Structuring the Site (page 20) – Locating Meaningful Public Realm – The expectation that slow traffic speeds can support the use of the streets as a public space may be misplaced.

7) DG6: Parking Strategies – Parking Solutions – On-street parking can cause obstructions and potential safety concerns for all NMUs and needs to be carefully considered before use.

Chapter 4: Appendices (page 40) – Creating a meaningful Design & Access (DAS) statement- This section is strongly supported, particularly DAS in the Pre-Application Process.

**This letter constitutes formal advice from the West Sussex Local Access Forum. High Weald AONB Partnership 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