

Site	SA29: Land south of St. Stephen’s Church, Horsted Keynes
MIQ concerned	3.3 Housing Delivery over the Plan Period: Can each of the following housing allocations demonstrate their sustainability and deliverability in relation to the following considerations: <i>(ii) safe and secure access, which can be provided <u>within the ownership of the allocated site, or does the scheme rely on the acquisition of off-site land;</u></i>
Part of document deemed to be unsound	Allocation of SA29: Land south of St. Stephen’s Church, Hamsland, Horsted Keynes
Soundness criteria	Fails on: Justified and Consistent with national policy (positively prepared / justified / effective / consistent with national policy)
New Information available	New information has become available following Reg 19 consultation in Dec 2020, notably the submission of a planning application (DM/20/4692) for SA29 (application validated Jan 2021). Many responses to the application have been received by MSDC, and a <u>Holding Objection</u> was submitted by Horsted Keynes Parish Council (HKPC) (Appendix 1). In addition, following the Reg 14 consultation of the Horsted Keynes Neighbourhood Plan HKNP (Nov / Dec 2020), Horsted Keynes Parish Council has <u>withdrawn support</u> for the MSDC Site Allocations DPD (minutes of Council meeting (30/3/21) – Appendix 2). This is following comments made by a large proportion of the respondents regarding site SA29 (Appendix 3 - responses to HKNP Reg 14 consultation), and notably here, the inability to provide a safe access.
Reasons for failure	<p>Allocation of SA29 is not <i>Justified</i>, as a safe and secure access to site SA29 is not achievable. A portion the land required for visibility splays to be achieved is <u>not</u> within the ownership of the allocated site, nor that of West Sussex County Council (WSSC) Highways.</p> <p>Allocation of SA29 is not <i>Consistent with national policy</i>, as NPPF paragraph 108 requires that “it should be ensured that safe and suitable access to the site can be achieved for all users”. It has not been Justified that all of the land required for visibility splays is within the ownership of the allocated site or WSSC Highways, nor that swept paths can be accommodated without losing heavily used on-street car parking or reducing footpath width below 1.5m on this section of Hamsland.</p> <p>The planning application DM/20/4692 has enabled detailed scrutiny of how 30 houses would be accommodated on the site, and is pertinent to this part of the Inspector’s hearing, due to issues concerning access and visibility splays.</p> <p>The allocation of SA29 relies on information available in the Site Allocations Library (SA29.1 through SA29.6) where all documents have been provided by the developer. This includes a Transport Statement (SA29.4). The same Transport Statement is provided as evidence by the developer in the planning application documents, however more detailed scrutiny has been possible through other documents submitted as part of the planning application – notably plans (Appendix 4). Serious failings with the plans are that dimensions on drawings do not match measurements on the ground, the electricity sub-station directly adjoining the access to the west is not shown, and there appear to be boundary clashes on drawings, none of which show the outline of ownership of the allocated site.</p> <p>Valid concerns have been raised by different respondents to the planning application DM/20/4692, concerned that the proposed access is not achievable within the land ownership of the allocated site. These responses include the HKPC (response to the application in Appendix 1, especially the third</p>

	<p>attachment), and the owner of Summerlea (property directly adjoining the site to the west), Mr Paul Fairweather. Please consider Mr Fairweather’s personal comments made to the hearings in conjunction with this representation.</p> <p>Concerns were raised directly to MSDC as part of responses to the DM/20/4692 application by HKPC on the 25/2/21 (Appendix 1), and Mr Fairweather directly with both Rydons and the planning officer concerned (over the last 2 months). I am surprised by the MSDC response (dated 22/3/21) to the Inspector’s question regarding site access achievability does not raise these comments as a justifiable concern to the achievable access at site SA29. The response by MSDC to the inspectors question relating to SA29 (MSDC 01 – page 51) states <i>‘Ownership of required access - Access from Hamsland using modified existing access. Direct access onto public highway from land <u>within applicant’s control.</u>’</i> To date it is not definite that this is the case.</p> <p>In summary – it has not been demonstrated that visibility splays can be provided on land in developer's control.</p>
<p>Reference to other DPD documents</p>	<p>MSDC 01 - MSDC Response to Inspector’s Initial Questions SA29.4 Transport Statement</p>
<p>How could the document be made sound?</p>	<p>Thorough due diligence should be carried out on the information provided by the developer regarding the achievable access to site SA29 – with respect to their land ownership and the neighbouring properties. This information is being challenged by a neighbour so clarity should be sought by all parties that a resolution has been achieved prior to allocation of SA29.</p> <p>For site SA29 to be deemed accessible it requires clear evidence in the form of a detailed plan and two critical cross-sections (one across the mouth of the entrance and one from the centre of the access road across Hamsland to the opposite brick wall) of the site entrance area at an appropriate scale so as to show clearly the proposed relationship of the new road, footpath, buried services, visibility splays and swept path analysis to:</p> <ul style="list-style-type: none"> • The land in control of the site promoter of SA29 • The electrical substation and its boundary (owned by the electricity company) • The boundary of Summerlea (private property of Mr P Fairweather) • The boundary of St Stephens Church (private property) • The 1.5m minimum width pavements both sides of Hamsland (east and west of the proposed access) • The available width of the proposed parking layby on Hamsland opposite the access point to SA29 <p>- The available width of Hamsland carriageway at this point</p> <p>If it becomes clear that the provision of compliant visibility splays requires use of land owned by UK Power Networks, and/or by Paul Fairweather and/or by the legal owner of the land occupied by St Stephens Church, or another, the developer would need to reach legal agreement with each affected landowner to demonstrate that safe access can be provided on land within their ownership or control.</p>
<p>What is the precise change that is sought?</p>	<p>Site SA29 should not be allocated for development if it cannot be demonstrated conclusively that safe access can be provided to the site in a form such that both:</p> <ul style="list-style-type: none"> • compliant visibility splays can be accommodated entirely within the WSCC Highway and on land within the ownership of the allocated site; and

	<ul style="list-style-type: none"> the swept path for turning refuse vehicles can be accommodated within the available highway without losing heavily used on-street car parking spaces opposite the site entrance, and without reducing footpath width below 1.5m along either side of this part of Hamsland.
Appendices	<p>Appendix 1 - Holding objection to application DM/20/4692 on SA29 by Horsted Keynes Parish Council - https://padocs.midsussex.gov.uk/PublicDocuments/00759920.pdf https://padocs.midsussex.gov.uk/PublicDocuments/00759917.pdf https://padocs.midsussex.gov.uk/PublicDocuments/00757401.pdf</p> <p>Appendix 2- minutes of Parish Council meeting withdrawing support for the MSDC Site Allocations DPD (30/3/21) https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/05/EGM300321PCMinsfinal.pdf</p> <p>Appendix 3 - Responses to Reg 14 consultation of the Horsted Keynes Neighbourhood Plan https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/01/20210107-HKNDP-Summary-of-Representations-1.pdf</p> <p>Appendix 4 - Plan of access and visibility splays in to SA29 (from planning application DM/20/4692 – 27/4/21) https://padocs.midsussex.gov.uk/PublicDocuments/00770027.pdf</p>

Site	SA29: Land south of St. Stephen's Church, Horsted Keynes
MIQ concerned	3.3 Housing Delivery over the Plan Period: Can each of the following housing allocations demonstrate their sustainability and deliverability in relation to the following considerations: <i>(vi) any significant impact on the <u>quality of the landscape</u>, e.g. the integrity of <u>any green gaps</u>, and the <u>ecology of the site and the surrounding area</u>, and <u>proximity to ancient woodland</u></i>
Part of document deemed to be unsound	Allocation of SA29: Land south of St. Stephen's Church, Horsted Keynes
Soundness criteria	Fails on: Justification (positively prepared / justified / effective / consistent with national policy)
New Information available	New information has become available following Reg 19 consultation in Dec 2020, notably the submission of a planning application (DM/20/4692) for SA29 (application validated Jan 2021). Many responses to the application have been received by MSDC, and a <u>Holding Objection</u> was submitted by Horsted Keynes Parish Council (HKPC) (Appendix 1). In addition, following the Reg 14 consultation of the Horsted Keynes Neighbourhood Plan HKNP (Nov / Dec 2020), Horsted Keynes Parish Council has <u>withdrawn support</u> for the MSDC Site Allocations DPD (minutes of Council meeting (30/3/21) – Appendix 2). This is following comments made by a large proportion of the respondents regarding site SA29 (Appendix 3 - responses to HKNP Reg 14 consultation), and notably here, the lack of protection for the trees on and proximal to the site, and the failure to provide substantive mitigation for the ecological impact.
Reasons for failure	<p>The allocation of site SA29 for 30 houses creates substantial impact to the quality of the protected High Weald AONB landscape, and in particular threatens the linear integrity of the trees on site (especially along the proposed access). The density of development proposed does not allow for adequate or substantive and impactful areas for ecological mitigation on site. In addition, the density of development proposed restricts the method of surface water drainage to subsurface storage tanks, going against AONB policy for sustainable drainage solutions.</p> <p>NPPF Section 15 paragraph 172 requires that <i>'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty'</i>. The development of site SA29, a medieval field system, with 30 houses replacing a green field ecosystem, does not enhance the landscape or the biodiversity.</p> <p>The allocation of site SA29 was based on the information provided by the site developer in the Site Allocation Library (documents SA29.1 to SA29.6). Since the regulation 19 consultation, this information has largely been superseded by the documents associated with the planning application DM/20/4692 for site SA29.</p> <p>The detailed scrutiny these new documents has shown how 30 houses would be accommodated on site SA29, and are thus pertinent to this part of the Inspector's hearing, with issues concerning protection of trees on site, the method of disposal of surface water, and general ecological concerns. These issues have been raised through the planning process associated with the application.</p> <p>The lack of substantive detail on the above issues has led to Horsted Keynes Parish Council submitting a holding objection to the application (Appendix 1) citing an over-development of the site with insufficient ecological continuity, or suitable SUDS drainage solution, and attendant risks to perimeter tree screening. In addition, the Parish Council has withdrawn its support for the site following representations made at reg 14 to the draft Neighbourhood Plan.</p> <p>Many residents of Horsted Keynes have put in representation to the planning application and can be found on the planning portal. I attach my own submission in Appendix 15 and Appendix 16.</p> <p>Damage to trees: Please refer to the site layout plan dated 27/4/21 showing root protection zones, and ecological mitigation areas in Appendix 13.</p>

The narrow (9m wide) proposed access to the site risks detrimental and permanent damage to a characteristic tree belt that runs parallel and within 2 metres of the proposed site access road. The access road and primary buried services to the site cross a substantial area of the root protection zones of these trees, yet no substantive mitigation measures have been proposed to protect the trees long term, as required in SA GEN. The developer has submitted minimal information as part of the planning application DM/20/4692 regarding Root Protection Areas (Appendix 13).

The tree officer has expressed concerns for the protection of these trees in relation to the services, and also the road construction (Appendix 10 and Appendix 11) and states: *'I have concerns over the impact the access road will have on the trees along the western boundary (T2 – G7). The access is narrow, which will involve constructing the access road very close to the trunks. My concerns relate to both the significant impact this is likely to have on the RPA of these trees, and also the proposed tree surgery that will need to be undertaken, which will be an ongoing commitment. Heavy reduction is likely to promote excessive regrowth which will increase the need for further pruning and consequently ongoing stress to these trees.'*

The AONB also express concern over the protection of the trees on the site stating *'Care should be taken to ensure that these trees are not damaged by the proposed development (particularly to gain access to the site)'* in Appendix 12. Concern has also been expressed that the intensity of development leads to houses located in close proximity to the trees on the perimeter of the site, leading to the risk of future lopping or damage to the trees in order to reduce shade and increase sunlight in their gardens. In addition, many respondents to the application have made comments (refer to planning portal), and I have submitted a detailed commentary (Appendix 15, and Appendix 16).

I am led to understand that additional works have been carried out on site since the application was lodged. Please refer to Mr Paul Fairweather's representation in conjunction with this submission.

Ecological mitigation:

Please refer to the site layout plan dated 27/4/21 showing root protection zones, and ecological mitigation areas in Appendix 13.

SA29 is allocating a green field site for 30 houses (on 1.13 ha), as such the density of housing fills the site leaving few open green spaces, or habitat for wildlife.

The AONB response to the application (Appendix 12) expresses concern over the lack of green space and the disconnected nature of the proposed green areas, stating that *'The area is too small to be managed effectively for ecology and appears more as an area of 'left over' space, a practice discouraged within the Design Guide'*.

The updated site layout plan in application DM/20/4692 dated 27/4/21, compared to that of the initial plan shows no marked improvement to the provision of ecological areas on the site.

In addition, many respondents to the application have made comments (refer to planning portal), and I have submitted a detailed commentary (Appendix 15, and Appendix 16). Recent responses to the application indicate that badgers use the site (Appendix 17 and Appendix 18). Of concern is that the ecology surveys presented by the applicant are very light touch, not showing detail of mouse surveys, bat flight paths, and other key indicator species. This is disappointing given the site is currently a medieval green field on the edge of a village within the AONB.

Surface water drainage:

Please refer to the Flood risk assessment and drainage strategy (dated Nov 2020) showing the subsurface drainage tanks proposed in Appendix 14 (page 29).

The high density of housing shown in application DM/20/4692 results in the design of surface water drainage system using sub surface storm water tanks. The AONB response to the application (Appendix 12) expresses concern over the use of sub surface storm water tanks. Their policies state that *'open sustainable drainage systems such as ditches and ponds should be used in preference to underground storage of water'*. These take up land area in a development, and as such the density of housing would need to be reduced, but ponds can be utilised to increase the biodiversity of the site – a positive for the ecological improvement of a development.

The updated site layout site layout plan in application DM/20/4692 dated 27/4/21 shows no sustainable drainage system proposed (Appendix 13).

In addition, many respondents to the application have made comments (refer to planning portal), and I have submitted a detailed commentary on the effect of site drainage downstream though ancient woodland and an SSSI (Appendix 15,).

Reference to other DPD documents	<p>O3 – National Planning Policy Framework O4 - AONB Management plan DPD1</p>
How could the document be made sound?	<p>The protection of the trees on site (especially along the access road), and the substantive and impactful mitigation of loss of ecology and biodiversity of site SA29 should be a condition of allocation.</p> <p>A sufficiently detailed method statement is needed to demonstrate how it is proposed to construct the access road, footpath and buried services to the site through the identified Root Protection Areas to build confidence that this can be done whilst <u>not fatally damaging these trees</u>. This should relate directly to BS5837: Trees in relation to construction – Recommendations.</p> <p>Should this not be addressed as a condition in the Site Selection DPD as a necessity to protect these trees, Site SA29 should be withdrawn from the allocations, as access is not available or achievable. MSDC Tree officer suggests a detailed landscape plan to reinforce the existing tree belt and mitigate for the loss of wildlife habitat would need to be submitted and agreed, accompanied by a long-term management plan for the establishment and long-term care of the trees. This should also be a condition before the site is allocated.</p> <p>The current density of the site does not allow for the substantive and impactful mitigation of the loss of a green field meadow in the AONB. AONB objectives state that <i>‘Local habitats and species should be protected and enhanced as appropriate and conditions applied to prevent loss of existing habitats including hedgerows (AONB Management Plan objectives G3, R2, W1, W2, FH2, and FH3)’</i>. The site is on an edge of village location in the AONB and as such the density of housing should reduce into the open countryside. The draft allocation for 30 houses on this 1.13 ha site is an overdevelopment and should be reduced to enable a transition to the countryside, and also providing the space for more meaningful onsite biodiversity gains, and a truly sustainable SUDS system.</p>
What is the precise change that is sought?	<p>Site SA29 should not be allocated for development if it cannot be demonstrated conclusively that the long-term integrity of the trees on site (especially along the proposed access) can be <u>guaranteed</u>. If the access is achievable without affecting the root protection areas of the boundary trees to the west of the access, the density of development (housing numbers) should be <u>substantially reduced</u> to allow for a substantive and impactful mitigation of loss of the ecology of a medieval field system resulting in a net gain to biodiversity, and not piecemeal areas within the development. The use of an open sustainable drainage system such as a settling pond could add to the ecological diversity of the site, and would adhere to AONB policy, but would only be able to be accommodated on site with a lower housing density.</p> <p>The reduction in the density of housing on the site would also reduce the impact on the edge of village location in the AONB, blending better in to the open countryside beyond.</p>
Appendices	<p>Appendix 1 - Holding objection to application DM/20/4692 on SA29 by Horsted Keynes Parish Council in 3 parts:- https://padocs.midsussex.gov.uk/PublicDocuments/00759920.pdf https://padocs.midsussex.gov.uk/PublicDocuments/00759917.pdf https://padocs.midsussex.gov.uk/PublicDocuments/00757401.pdf</p> <p>Appendix 2- minutes of Parish Council meeting withdrawing support for the MSDC Site Allocations DPD (30/3/21) https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/05/EGM300321PCMinsfinal.pdf</p> <p>Appendix 3 - Responses to Reg 14 consultation of the Horsted Keynes Neighbourhood Plan https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/01/20210107-HKNDP-Summary-of-Representations-1.pdf</p> <p>Appendix 10 – Tree officer comments to planning application DM/20/4692 #1 – effect of access road https://padocs.midsussex.gov.uk/PublicDocuments/00754061.pdf</p> <p>Appendix 11 – Tree officer comments to planning application DM/20/4692 #2 – services https://padocs.midsussex.gov.uk/PublicDocuments/00756971.pdf</p> <p>Appendix 12 – AONB comments to application DM/20/4692 https://padocs.midsussex.gov.uk/PublicDocuments/00753743.pdf and map https://padocs.midsussex.gov.uk/PublicDocuments/00753744.pdf</p> <p>Appendix 13 – Layout plan of SA29 as per application DM/20/4692 (dated 27/4/21) showing root protection zones, and ecological mitigation areas.</p>

<https://padocs.midsussex.gov.uk/PublicDocuments/00769856.pdf>

Appendix 14 – Flood risk assessment and drainage strategy (dated Nov 2020) as per application DM/20/4692

<https://padocs.midsussex.gov.uk/PublicDocuments/00747913.pdf>

Appendix 15 – Response to planning application DM/20/4692 by Helena Griffiths regarding environmental impact of the proposed development

<https://padocs.midsussex.gov.uk/PublicDocuments/00754562.pdf>

Appendix 16 – Response to planning application DM/20/4692 by Helena Griffiths regarding scale of the proposed development

<https://padocs.midsussex.gov.uk/PublicDocuments/00754851.pdf>

Appendix 17 – Response to planning application DM/20/4692 by Alison Nicholson regarding badgers proximal to the site

<https://padocs.midsussex.gov.uk/PublicDocuments/00757694.pdf>

Appendix 18 - Response to planning application DM/20/4692 by Alison Nicholson regarding badgers proximal to the site

<https://padocs.midsussex.gov.uk/PublicDocuments/00765983.pdf>

Site	SA29: Land south of St. Stephen's Church, Horsted Keynes
MIQ concerned	3.3 Housing Delivery over the Plan Period: Can each of the following housing allocations demonstrate their sustainability and deliverability in relation to the following considerations: <i>(v) any significant infrastructure considerations, including vehicular access, traffic circulation and highway and pedestrian safety, flooding, drainage and sewerage implications; are any of these 'showstoppers';</i>
Part of document deemed to be unsound	Allocation of SA29: Land south of St. Stephen's Church, Hamsland, Horsted Keynes
Soundness criteria	Fails on: Justified and Consistent with national policy (positively prepared / justified / effective / consistent with national policy)
New Information available	New information has become available following Reg 19 consultation in Dec 2020, notably the submission of a planning application (DM/20/4692) for SA29 (application validated Jan 2021). Many responses to the application have been received by MSDC, and a <u>Holding Objection</u> was submitted by Horsted Keynes Parish Council (HKPC) (Appendix 1). In addition, following the Reg 14 consultation of the Horsted Keynes Neighbourhood Plan HKNP (Nov / Dec 2020), Horsted Keynes Parish Council has <u>withdrawn support</u> for the MSDC Site Allocations DPD (minutes of Council meeting (30/3/21) – Appendix 2). This is following comments made by a large proportion of the respondents regarding site SA29 (Appendix 3 - responses to HKNP Reg 14 consultation), and notably here, the inability to provide a safe access, and the lack of consideration of the cumulative impact on traffic flow in an already congested part of a rural village.
Reasons for failure	Allocation of SA29 is not <i>Justified</i> and is not <i>Consistent with national policy (NPPF paragraph 108)</i>, as vehicular access, traffic circulation, and highway and pedestrian safety will all be severely impacted by this development, so a safe and suitable access into site SA29 has not be achieved. The recent planning application DM/20/4692 has enabled the detailed scrutiny of how 30 houses would be accommodated on site SA29, and pertinent to this part of the Inspector's hearing, issues concerning access to the site from the highways network along the western section of Hamsland, and the adjustment of the road layout directly opposite the access to SA29, by the provision of a layby to accommodate existing parking and allow a swept path in to the site. Hamsland is the only access road leading to the site entrance of SA29. It effectively operates along much of its length as a single-track road, often with limited or no passing places, all provided by informal spaces provided by a break in the line of parked cars along the norther side of the road. It already serves about 120 homes, and already experiences safety and parking issues. The cumulative impact of the development of SA29 on the residents of Hamsland (added parking stress, and significantly increased flows of traffic along the single-track road, and the resulting safety concerns of residents) have not been properly addressed, and a lack of evidence has been provided and no proposals have been made by the site promoter to suggest that a safe access is achievable <u>leading to the site along Hamsland.</u>

The allocation of SA29 relies on information available in the Site Allocations Library (SA29.1 through SA29.6) where all documents have been provided by the developer. This includes a Transport Statement (SA29.4).

The same Transport Statement is provided as evidence by the developer in the planning application documents, which includes a parking stress analysis. The data presented bears no representation to the reality on the ground. It contains demonstrably unreliable Parking Survey data, with parking assumed on junctions, and across driveways. This has now been scrutinised in detail by several parties and information included in that report is incorrect, and misleading. Other serious failings include that dimensions on drawings do not match measurements on the ground, especially around the access on to Hamsland (where a parking layby is proposed to allow the swept path of large vehicles to and from the site).

Responses to the planning application DM/20/4692 highlighted valid concerns regarding the validity of the information in the Transport Statement (SA29.4). Multiple respondents are concerned that the proposed route to access the site from the highway is unsafe due to the increased risks associated with resolving frequent head-to-head conflicts on the effectively single-track road. The detailed responses include my own comments (Appendices 5, 6, 8, and 9), those of HKPC in its Holding Objection to the current planning application (Appendix 1 particularly attachment 3), and a transport consultant representing the residents of Hamsland (Appendix 10).

Much of the residents' concern is about the unsafe consequences of vehicles responding to head-to-head conflicts and blockages on this single-track 150m length of Hamsland due to parked cars, deliveries, emergency vehicle visits, etc., all of which frequently occur currently. These conflicts have to be resolved either by a vehicle driving up onto the verge and/or footpath, or by undertaking an extended reversing manoeuvre by one or more vehicles, both of which bring attendant material safety risks to pedestrians and/or other road users. The submitted transport statement (SA29.4) seeks to sidestep this critical issue by its reliance on its fortuitous but demonstrably implausible parking survey in the last week before school holidays in July 2019. This runs counter to many villagers' regular experience of this road, hence the volume of concern raised in responses to successive consultations and underpinned by the February 2021 indicative parking survey contained in the Access attachment (part 3) to HKPC Holding Objection (Appendix 1).

Concerns were raised directly with MSDC as part of responses to the DM/20/4692 application by HKPC on the 25/2/21 (Appendix 1), Myself (12/2/21 Appendix 5, and 17/3/21 Appendix 6), and as such I am surprised by the MSDC response (dated 22/3/21) to the inspector's question regarding site access achievability and safety does not raise these comments as a justifiable concern to the achievable access at site SA29 (MSDC 01).

The response by MSDC to the inspectors question relating to SA29 (MSDC 01 – page 51) states *'Evidence of satisfactory impact on flow and safety of surrounding primary and secondary highway networks - No comments received from WSCC Highways at Regulation 19 Stage. No issues have been identified in the Strategic Transport Assessment (T7) however a detailed transport*

	<p><i>assessment will be secured at the planning application stage to ensure highway safety is maintain and safe access is achieved'.</i></p> <p>To date no detailed transport assessment has been submitted with the application. It appears none of the concerns of the respondents to both Reg 19 or the planning application from the parish have been addressed or considered in detail to date.</p> <p>In summary - It has not been demonstrated that a safe and secure access into site SA29 is achievable, as vehicular access, traffic circulation, and highway and pedestrian safety along a single-track road will all be severely impacted by this development. In addition, it is not conclusive that the swept path at the entry to site is achievable on the ground and does not lose essential on-street parking opposite.</p> <p>The allocation of SA29 as currently conceived is unsound as is not consistent with NPPF (paragraph 108) and the flow down policies in the WSCC Local Transport Plan (1.2.4) and MSDC District Plan (DP21) regarding the safety of road users and pedestrians. It demonstrably does not deliver the WSCC LTP 1.2.4 requirement to deliver “a transport network that feels, and is, safer and healthier to use”</p>
<p>Reference to other DPD documents</p>	<p>NPPF - O3 West Sussex County Council Local Transport Plan MSDC District Plan – DPD5 MSDC Response to Inspector’s Initial Questions - MSDC 01</p>
<p>How could the document be made sound?</p>	<p>Thorough due diligence should be carried out on the information provided by the developer regarding the achievable access to site SA29 – with respect to the safely achievable access, notably cumulative traffic flow and parking stress. This information has been technically challenged by multiple respondents, on multiple occasions, and also by the general public who live along Hamsland, who live with the existing traffic issues daily. No mitigation for the issues raised has been forthcoming.</p> <p>For site SA29 to be deemed accessible it requires a <u>detailed Transport Assessment</u> to be provided <u>prior</u> to SA29 being allocated, including undertaking a new parking stress survey at an appropriate time so as to accurately reflect prevailing conditions. The Transport Assessment should clearly identify appropriate mitigation measures (if any are available) for any material problems identified included as an indivisible part of the scheme. Failure to do this may result in severe unacceptable traffic flow issues being permanently inflicted on a large part of a rural village.</p>
<p>What is the precise change that is sought?</p>	<p>Site SA29 should not be allocated for development if it cannot be demonstrated conclusively that safe access can be provided to the site in a form such that both:</p> <ul style="list-style-type: none"> • increased traffic levels can be handled in a manner that, at best, improves or, at worst, does not exacerbate, existing unsatisfactory safety concerns for existing residents as a result of the essentially single track western part of Hamsland; and • the swept path for turning refuse vehicles can be accommodated within the available highway without losing heavily used on-street car

	parking spaces opposite the site entrance, and without reducing footpath width below 1.5m along either side of this part of Hamsland.
Appendices	<p>Appendix 1 - Holding objection to application DM/20/4692 on SA29 by Horsted Keynes Parish Council in 3 parts:- https://padocs.midsussex.gov.uk/PublicDocuments/00759920.pdf https://padocs.midsussex.gov.uk/PublicDocuments/00759917.pdf https://padocs.midsussex.gov.uk/PublicDocuments/00757401.pdf</p> <p>Appendix 2- minutes of Parish Council meeting withdrawing support for the MSDC Site Allocations DPD (30/3/21) https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/05/EGM300321PCMinsfinal.pdf</p> <p>Appendix 3 - Responses to Reg 14 consultation of the Horsted Keynes Neighbourhood Plan https://horstedkeynesparishcouncil.com/wp-content/uploads/2021/01/20210107-HKNDP-Summary-of-Representations-1.pdf</p> <p>Appendix 5 – Helena Griffiths representation to the planning application (DM/20/4692) 12/2/21 https://padocs.midsussex.gov.uk/PublicDocuments/00753487.pdf</p> <p>Appendix 6 – Helena Griffiths second representation to the planning application (DM/20/4692) 17/3/21 https://padocs.midsussex.gov.uk/PublicDocuments/00761893.pdf</p> <p>Appendix 7 – Paul Fairbairn representation to the planning application (DM/20/4692) https://padocs.midsussex.gov.uk/PublicDocuments/00757174.pdf</p> <p>Appendix 8 – Helena Griffiths assessment of the parking survey submitted in response to the Reg 14 consultation of the Horsted Keynes Neighbourhood plan https://padocs.midsussex.gov.uk/PublicDocuments/00753254.pdf</p> <p>Appendix 9 – Helena Griffiths assessment of traffic issues in Horsted Keynes submitted in response to the Reg 14 consultation of the Horsted Keynes Neighbourhood plan https://padocs.midsussex.gov.uk/PublicDocuments/00753257.pdf</p> <p>Appendix 10 – Response to planning application by Pelham Transport Consulting on behalf of HAG https://padocs.midsussex.gov.uk/PublicDocuments/00754884.pdf</p>