

Site	SA29: Land south of St. Stephen's Church, Horsted Keynes
MIQ concerned	Matter 6: Are the Transport, Infrastructure, Implementation and Monitoring provisions of the Plan sound? 6.5 Does the identification of detailed schemes for highways improvements provide the necessary certainty to enable key housing and employment allocations to be delivered?
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 regarding the lack of infrastructure to support this site allocation. 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withdrawn support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), again regarding the lack of infrastructure to support this site allocation, due to the 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, as a safe and suitable access into site SA29 has not be achieved. The mitigation of these impacts on the community should be part of conditions of the allocation, and this should include the highways improvement of Hamsland prior to the development commencing. The impact on the infrastructure of the allocation of sites in Horsted Keynes may not be on the same scale as the hundreds of homes in Burgess Hill and in other areas throughout the district, but the existing road infrastructure in this out of the way rural area is already under pressure and struggling. Key artery roads from the villages in to the towns are full of pot holes, roads are used as rat runs, and traffic levels have increased year on year. Local to the site SA29, the access is also under strain. Hamsland is the only access road leading to the site entrance of SA29. It effectively operates along much of its length as a <u>single-track road</u> , often with limited or no passing places, all provided by informal spaces provided by a break in the line of parked cars along the northern 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 as to how this constraint will be addressed. Providing a safe access <u>leading to the site</u> along the western portion of Hamsland would require highways improvements and should be a condition of allocation.

	<p>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 will enhance the access directly in to the site, but consideration and mitigation is needed along the bottleneck of the western portion of Hamsland.</p> <p>At Reg 14 of the HKNP, many residents responded. 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).</p> <p>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), Pelham Transport Consulting (Appendix 10) and Paul Fairbairn (Appendix 7), 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).</p> <p>The response by MSDC to the inspectors question relating to SA29 (MSDC 01 – page 51) states <i>'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 assessment will be secured at the planning application stage to ensure highway safety is maintain and safe access is achieved'</i>. This shows no acknowledgement of the myriad of concerns raised at both Reg 18, Reg 19, Reg 14 (Appendix 8 and Appendix 9) and in responses to the current planning application.</p> <p>To date no detailed Transport Assessment has been submitted with the application DM/20/4692. 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". Without the improvement of the local infrastructure, notably the width of Hamsland along its western portion, access to SA29 is a constraint</p>
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	to its deliverability. It is essential that this access is made safe and this the highways improvement of this road should be made a requirement of the allocation.
Reference to other DPD documents	NPPF - O3 West Sussex County Council Local Transport Plan MSDC District Plan – DPD5 MSDC Response to Inspector’s Initial Questions - MSDC 01
How could the document be made sound?	<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 along Hamsland. 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, but mitigation is required.</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>The allocation of this site should be dependent on highways improvements along the western part of Hamsland.</p>
What is the precise change that is sought?	<p>Site SA29 should <u>not be allocated</u> 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. <p>The allocation of this site should be dependant on highways improvements along the western part of Hamsland.</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 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</p>

	<p>https://padocs.midsussex.gov.uk/PublicDocuments/00761893.pdf Appendix 7 – Paul Fairbairn representation to the planning application (DM/20/4692)</p> <p>https://padocs.midsussex.gov.uk/PublicDocuments/00757174.pdf Appendix 8 – Helena Griffiths assessment of the parking survey submitted in response to the Reg 14 consultation of the Horsted Keynes Neighbourhood plan</p> <p>https://padocs.midsussex.gov.uk/PublicDocuments/00753254.pdf 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</p> <p>https://padocs.midsussex.gov.uk/PublicDocuments/00753257.pdf Appendix 10 – Response to planning application DM/20/4692 by Pelham Transport Consulting on behalf of HAG</p> <p>https://padocs.midsussex.gov.uk/PublicDocuments/00754884.pdf</p>
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