Technical Note: Failure to provide Safe and Suitable Access to SA29

1 Introduction

1.1 At all levels, planning policy sets out the imperative of ensuring that safe access can be provided to a site allocated for development:

NPPF Paragraph 108

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- ….
- *safe and suitable access to the site can be achieved for all users*; and
- any significant impacts from the development on the transport network (in terms of capacity and congestion), *or on highway safety*, can be cost effectively mitigated to an acceptable degree.

West Sussex Local Transport Plan 2011 to 2026

1.2.4 Improving Safety, Health & Security: *A transport network that feels, and is, safer* and healthier to use.

Mid-Sussex District Plan 2014 – 2031

DP21: Transport

Development will be required to support the objectives of the West Sussex Transport Plan 2011-2026

To meet these objectives, decisions on development proposals will take account of whether:

- …
- The scheme *protects the safety of road users and pedestrians*; and
- …

-

1.2 This is not a test about whether the proposed access to SA29 would cause 'severe' congestion on the road network in and around Horsted Keynes – it will not, given the fairly low traffic levels, albeit it will create greater local inconvenience and delay for existing and future residents of Hamsland and Challoners. This is about whether the proposed allocation and subsequent development of SA29 would create an unacceptable impact on highway safety. Those are two separate considerations, as the 'or' in NPPF 109 makes clear:

NPPF Paragraph 109

Development should only be prevented or refused on highways grounds if there would be *an unacceptable impact on highway safety*, or the residual cumulative impacts on the road network would be severe.

1.3 Further reinforcement of the imperative of reducing conflicts and providing safe access is given in NPPF paragraph 110:

NPPF Paragraph 110

Within this context, applications for development should:

…

c) *create places that are safe*, secure and attractive – which *minimise the scope for conflicts between pedestrians, cyclists and vehicles*, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and *access by service and emergency vehicles*; and

…

1.4 This Technical Note contends that *safe and suitable access to the site* ***cannot*** *be achieved for all users*, due to the extraordinary circumstances of SA29 being towards the end of a cul-de-sac of c.120 homes with already highly constrained access, which would be exacerbated by the addition of a further 30 homes with the development of SA29.

1.5 Most of these properties, including the proposed SA29 site, are accessed by an unlit, 150m length of narrow 5.5m wide carriageway on the western part of Hamsland, which experiences extensive on-street residents' parking on the inside of two bends. This Technical Note demonstrates that the on-street parking generates extensive lengths of single-track operations, typically 50 to 90m in length, with limited forward visibility due to the blind bends. This Technical Note contends that the existing situation is already unsafe, as the extensive single-track sections already result in frequent blockages and head-to-head conflicts. This would be exacerbated by the prediction in the Transport Statement supporting this proposed allocation of SA29 of a development-related increase in trips along this link of up to 56%.

Figure 1: Blind bend concealing any oncoming cars at entry point to 70m single-track section (View looking east along Hamsland, 20m east of Lewes Road junction. Friday 5th February @ 09:23)

1.6 By contrast, the Transport Statement supporting the proposed allocation of SA29 contends that there is limited on-street parking on Hamsland and that there is ample opportunity to pass on the 5.5m wide carriageway without creating head-to-head conflicts.

2 Head-to-Head Conflicts

2.1 Section 6 of the Transport Statement describes a Stage 1 Road Safety Audit (RSA) commissioned by RPS, on behalf of Rydon Homes, from Taylor Bowie Ltd. It is clear from Appendix A of the RSA, that Taylor Bowie was originally briefed to review just two elements:

- Proposed Site Access – Visibility Splay

- Proposed Site Access – 12m refuse Vehicle Swept Path Analysis.

Taylor Bowie was subsequently briefed to look at the proposed relocation of the dropped kerb crossing of Hamsland, which is removed by the proposed site access and new lay-by opposite the access, following comments raised by the auditor and by WSCC Highways Planning Officer in reviewing Rydon Homes' concurrent planning application for this site. Taylor Bowie has never been commissioned to look at access to the site along the western part of Hamsland.

2.2 In reviewing the proposed site access arrangements in its original brief, Taylor Bowie was also concerned about and highlighted the risk of a head-to-head vehicle conflict at a pinch point on a short length of the site access road, and encouraged the designer to address this deficiency, which has been done. This pinch point narrows the site access road from 5.5m down to 4.8m over a short length in order to pass mature trees just inside the south-western boundary of the site.

2.3 Head-to-head conflicts are a significant safety concern, as resolution of a head-to-head conflict on a narrow road either requires one or more of the vehicles to reverse to a wider part of the highway to let the oncoming vehicle(s) pass, or it requires one or more of the vehicles to mount the kerb to pass the oncoming vehicle(s):

- Vehicles having to reverse is inherently unsafe, with significantly reduced visibility and more sensitive steering when reversing, increasing the risk of an inadvertent vehicle to vehicle collision or vehicle to cyclist/pedestrian conflict. Modern interventions such as the provision of reversing buzzers on commercial vehicles and the introduction of sensors and reversing cameras on cars highlight the hard-won lesson learnt about the severity of this hazard;
- Vehicles mounting the kerb and encroaching on a footpath, with the attendant risk of pedestrian to vehicle conflict, present a self-evident hazard for pedestrians.

Figure 2: Evidence of frequent driving on grass verge and pavement along Hamsland as a result of head-to-head conflicts (View looking east along Hamsland c.75m east of Lewes Road junction. Friday 5th February @ 9:22; Inset Monday 22nd February @ 17:34)

2.4 Neither of these potential actions to resolve a head-to-head conflict between two or more vehicles contribute positively to a requirement to "*minimise the scope for conflicts between pedestrians, cyclists and vehicles" (NPPF110c)*, or to deliver "*A transport network that feels, and is, safer and healthier to use*" *(WSLTP 1.2.4)*.

2.5 The Transport Statement, which supports this proposed allocation, records that the road safety auditor saw fit to raise the risk of head-to-head conflicts on a c.10-20m length of the site access road serving 30 dwellings. The designer has responded to that identified risk by extending the length of the road at full 5.5m width, in order to reduce the length of the 4.8m wide pinch point.

2.6 Hamsland is the only access from the local road network to the proposed site and, with the development of SA29, would be carrying traffic from c.150 dwellings in Hamsland, Challoners and the proposed development. Even the low levels of on-street parking captured by RPS's parking stress survey of Hamsland will have generated longer and narrower 'pinch points' along Hamsland than that which gave rise to concern on the site access road - at least 25-30m long and 3.0 to 3.5m in width, with the attendant risk of head-to-head conflicts. It is therefore a surprising omission that the Transport Statement does not also include any RSA commentary about the safety implications of adding additional development-related traffic to this already unsatisfactory situation.

2.7 The key consideration here is the extent of on-street residents' car parking, and whether it is sufficiently intense to create extended single-track operation, or whether the car parking is insignificant, with frequent gaps that enable cars to pass with ease. The Transport Statement is clear that it believes, after undertaking a parking stress survey in mid-July 2019, that the latter position prevails, stating in paragraphs 2.23 and 2.24:

> *2.23 The survey team identified that all vehicles parked on the north side of Hamsland allowing one unobstructed lane in and out of Hamsland. In addition, the survey team noted that there were no issues relating the parked cars and sufficient gaps were provided between parked vehicles for vehicles to pass easily*
>
> *2.24 In summary, the level of on street parking that occurs along Hamsland is not considered significant and there are sufficient gaps between vehicles for vehicles to pass if required. The level of traffic that uses Hamsland is low as it is a cul-de-sac and as such the level of on street parking will remain consistent as it is not generally used by vehicles other those living or visiting people in this area. The additional traffic that will be generated by the proposed development will not result in any material change to the flow of traffic that which currently occurs.*

2.8 This Technical Note contends that the parking stress survey which underpins this conclusion was undertaken at an inappropriate time of year at the height of summer in mid-July, when many residents will have been away on holiday, and has generated unrepresentative, unduly optimistic data upon which to base such a critical decision - data which is fundamentally at odds with the day-to-day experience of residents. The Lambeth Transport Parking Survey Methodology, which is a widely respected codification of good practice for parking stress surveys, is very alive to the risk of gathering unreliable, unrepresentative data at this time of year and specifically advises against surveying: *"… in weeks that include Public Holidays and school holidays and it is advised that weeks preceding and following holidays should also be avoided…."*. RPS should have been aware of this and should have scheduled this important survey at an appropriate time of year.

2.9 This Technical Note presents additional data from a second parking stress survey which was undertaken covertly in February 2021 to avoid any artificial inflation of numbers by residents. This second survey found far higher levels of parking stress, much more in accordance with residents' day-to-day experience. This was surveyed during a period of COVID restrictions, which may have increased daytime parking levels, but should not affect evening parking levels, which are the most important for understanding a.m. peak conditions. This survey should be a good representation of parking stress for the majority of months in the year which lie outside a major holiday period.

2.10 This new car park survey was able to identify the length of individual pinch points on the approach along Hamsland to the site, creating single-track operations with the risk of head-to-head conflicts. The shortest individual pinch point observed was 50m in length and the longest observed was 90m in length. In the aggregate, over the full length of Hamsland to the west of the site access, the single-track lengths were observed in 4 of the 6 surveys to total 100m or more in length, as shown pictorially in Appendix A of this document.

3 Car Parking Stress Surveys

3.1 A car parking stress figure on a stretch of road is a combination of two factors – it is arrived at by dividing the surveyed car parking demand by the available car parking supply.

Supply

3.2 Rydon Homes has submitted as Appendix 3 to its Action Note (REP-2140-022c), a document from RPS which seeks to swat away representations made by Dr Helena Griffiths to the concurrent planning application about the Transport Statement over-stating car parking supply.

3.3 Astonishingly, Rydon's Appendix 3 claims a capacity of 42 spaces by explicitly defending the inclusion of lengths of kerb in its assessment of car parking supply that contravene Rule 243 in the Highway Code:

> *Rule 243 extract: DO NOT stop or park: (amongst other places)*
> - *opposite or within 10 metres (32 feet) of a junction, except in an authorised parking space*
> - *in front of an entrance to a property*

There is no apparent appreciation, and certainly no acknowledgement, by RPS that parking in these non-compliant locations might actually reflect high demand struggling with a lack of available parking spaces in more conventional and appropriate locations.

3.4 Similar points about over-stated supply were made in a separate objection on matters of Access made by Paul Fairbairn. This analysed the parking stress for Hamsland in two sections with a combined capacity of 37 spaces in total along the full length of Hamsland:

- Section A from Lewes Road to Challoners, where the focus is primarily on the implications of parking stress levels on access to the proposed development and to existing properties in Challoners and at the eastern end of Hamsland; and
- Section B from Challoners to Challoners/Bonfire Lane, centred on the development site, where the focus is primarily on the risk of overspill parking from the site, both during construction and thereafter post-completion.
- Sections A and B are both a little over 100m available length with capacities of 19 cars and 18 cars respectively – this is shown pictorially in Figure 3.

Extract from Highway Code: Rule 243
DO NOT stop or park:

- anywhere you would prevent access for Emergency Services
- opposite or within 10 metres (32 feet) of a junction, except in an authorised parking space
- where the kerb has been lowered to help wheelchair users and powered mobility vehicles
- in front of an entrance to a property

Parallel parking: widespread guidance is to allow 6 linear metres length per space for reverse in, drive out parking Permits up to **37 parking spaces** complying with Highway Code, not the 42 parking spaces used in the parking stress survey
Passing places in single lane sections: Look for at least 10 linear metres to permit drive in, drive out passing manoeuvre

Figure 3: Calculation of available parking supply on Hamsland

3.5 The WSCC Highways Planning Officer accepted in a 22nd March 2021 submission that if car parking supply was restricted from the 42 spaces claimed to the 37 spaces actually available, that this would increase car parking stress, but she did not pick up on and respond to concerns raised regarding the reliability of the demand data used in the Transport Statement to generate the car park stress figures.

Demand

3.6 Paragraphs 2.16 to 2.24 of the Transport Statement set out the results of a car parking survey carried out on the full c.285m length of Hamsland from Lewes Road to the Challoners / Bonfire Lane junction on 14 occasions over two days in July 2019 and the conclusions that can be drawn from this survey. As a result of this survey, and using an inappropriate 42 spaces available supply, the Transport Statement summarises in paragraph 2.22 that "on average around 50% of the potential maximum parking capacity is used on a regular basis".

Table 2.4: Hamsland Parking Stress – Thursday 18 July 2019

Time Period	Total Spaces Available	Occupied	Spare Spaces	Stress (%)
06:00 - 07:00	42	22	20	52%
08:00 - 09:00	42	18	24	43%
09:00 - 10:00	42	16	26	38%
12:00 - 13:00	42	15	27	36%
13:00 - 14:00	42	17	25	40%
17:00 - 17:30	42	18	24	43%
17:30 - 18:30	42	19	23	45%
19:00 - 19:30	42	21	21	50%
20:00 - 21:00	42	24	18	57%

Table 2.5: Hamsland Parking Stress – Sunday 14 July 2019

Time Period	Total Spaces Available	Occupied	Spare Spaces	Stress (%)
06:00 - 10:00	42	23	19	55%
12:00 - 13:00	42	21	21	50%
13:00 - 14:00	42	22	20	52%
17:00 - 19:00	42	21	21	50%
19:00 - 21:00	42	22	20	52%

Figure 4: Transport Statement mid-July 2019 Parking Survey - extract

3.7 This survey and resulting summary are so far removed from local experience, that Paul Fairbairn was moved to repeat the parking survey methodology on 6 occasions over three days in February 2021 - results are summarised in Figure, with the underlying data and analysis in Appendix A.

3.8 The quantitative evidence gathered, summarised in Figure 5 below, is very different from that reported by RPS and clearly aligns with the qualitative local experience, which holds that parking levels are far higher than stated in the Transport Statement, and that contrary to the assertion in paragraph 2.23 of the Transport Statement, vehicle movement along the western leg of Hamsland is frequently a problem due to head-to-head conflicts in extended

lengths of single-track two-way operation. The February 2021 parking survey identified average parking stress levels close to 80%, with a peak over the whole length of Hamsland approaching 90%, rather than the average of c.50% claimed in the Transport Statement. The data captured in February 2021 was also analysed for the western and eastern sections of Hamsland, as shown in Appendix A. For the eastern section, parking stress levels peaked at 100% in 2 of the 6 survey periods.

Table 1: Hamsland Parking Stress – Friday 5 February 2021

Time Period	Total Spaces Available	Occupied	Spare Spaces	Stress (%)
09:15 - 09:30	37	23	14	62%
18:15 - 18:30	37	29	8	78%

Table 2: Hamsland Parking Stress – Saturday 6 February 2021

Time Period	Total Spaces Available	Occupied	Spare Spaces	Stress (%)
09:30 - 09:45	37	27	10	73%
20:30 - 20:45	37	32	5	86%

Table 3: Hamsland Parking Stress – Sunday 17 February 2021

Time Period	Total Spaces Available	Occupied	Spare Spaces	Stress (%)
09:30 - 09:45	37	33	4	89%
21:45 - 22:00	37	32	5	86%

Figure 5: February 2021 Parking Survey

3.9 A headline comparison of the two surveys is shown in Figure 6 below, and shows that the maximum observed at late evening by RPS's surveyor was broadly the same as the minimum observed during the day by Paul Fairbairn, and well below the maximum observed in the evening by him:

Hamsland (All)	RPS Parking Survey Mid-July 2019			Paul Fairbairn Parking Survey Early-February 2021	
Observed	Cars Parked	42 space %	37 space %	Cars Parked	37 space %
Maximum	24	57%	65%	33	89%
Minimum	15	36%	41%	23	62%

Figure 6: Summarised comparison of mid-July 2019 and February 2021 Parking Stress Surveys

3.10 As a further datapoint to underpin the clear gulf between the Transport Statement's observed parking demand and the reality that residents experience regularly, the satellite image in Figure 3 is a mid-morning summer snapshot, probably captured in 2020, showing 32 vehicles parked along the length of Hamsland and in the now fenced off St Stephens's Church car park, and a further 2 cars overspilling around the junctions with Challoners. Whilst it might have been affected by COVID, this daytime parking demand is very significantly higher than the evening maximum demand claimed in the Transport Statement.

3.11 Whilst COVID lockdown will undoubtedly have inflated daytime parking above normal levels, there should not be significant variation in night-time parking levels, which are critical for assessing a.m. peak conditions, between any of the surveys. If a parking stress survey in the Transport Statement is to have any credibility, it cannot promote a situation in which its

evening maximum significantly undershoots any observed daytime parking level, as shown clearly in the satellite image in Figure 3.

3.12 The only logical conclusion of the significant understatement of demand in the Transport Statement is that the survey was undertaken at a time of year in mid-summer when many residents were away on holiday and were simply not there to have their vehicles counted at any time of day.

3.13 Parking stress surveys are typically undertaken to assess whether potential overspill parking from the proposed development might create an unacceptable impact for existing residents. This is certainly a concern with this proposed site allocation, particularly on the eastern section of Hamsland immediately adjacent to the site entrance, where the level of parking stress was observed by Paul Fairbairn at 100% on two of the six events surveyed (see Appendix A).

3.14 The high levels of parking observed on the western section of Hamsland also give rise to a further significant concern, namely the extent to which parked cars effectively reduce this narrow 5.5m wide road to long lengths of single-track operation, and whether sufficient opportunistic passing places present themselves between these parked cars to permit the safety risks associated with head-to-head conflicts along this section of Hamsland to be within acceptable bounds.

3.15 Given the significance of the conclusions drawn in paragraphs 2.23 and 2.24 of the Transport Statement regarding the apparent ease of access along Hamsland to the site, contrary to the repeated representations of residents, the February 2021 survey and the Figure 3 satellite image provide quantified evidence that the demand data captured by the parking stress survey in the Transport Statement is unreliable and does not represent a sound base upon which to draw such significant conclusions.

4 Length of Single-Track Operations along Hamsland

4.1 At face value, the lowest parking stress figure recorded in February 2021 for the western section of Hamsland of 58%, on both Friday and Saturday morning, illustrates the effect, shortly after the morning 08:00 to 09:00 peak, of several residents having left for work, gone shopping or gone out for exercise, leaving a substantial length of the road free of parked cars. However, the data sheets in Appendix A show that, on both these days, this section of Hamsland still had two or three significant lengths of single-track operation:

- 70m and 15m on the Friday with a passing place of 30m between them; and
- 50m, 20m and 20m on Saturday morning with passing places of 15m between them.

By contrast, the Saturday evening and Sunday morning data showed the highest occupancy for this section of Hamsland, with a peak stress level of 79%. On the Saturday evening, this level of occupancy generated the longest length of single-track operation:

- 90m and 15m with a 35m passing place between them.

4.2 The risks associated with single-track sections are exacerbated if one or both bends along this length of Hamsland lie within the single-track section. Cars and vans parked on the inside of these bends significantly restrict forward visibility, which increases the probability of head-to-head conflicts as the drivers of oncoming vehicles often cannot see one another before entering the single-track section. Assuming a short 10m minimum length required for

useable drive in, drive out passing place for a car (some guidance recommends 15m minimum), in five of the six periods surveyed the longest single-track section included a blind bend, and the remaining one started on the bend:

Friday 5th February	Morning	70m single-track section with blind bend
Friday 5th February	Evening	70m single-track section with blind bend
Saturday 6th February	Morning	50m single-track section - slight bend
Saturday 6th February	Evening	90m single-track section with blind bend
Sunday 7th February	Morning	75m single-track section with blind bend
Sunday 6th February	Late-evening	85m single-track section with blind bend

Figure 7: Length and alignment of longest single-track section with no passing place (>10m gap)

4.3 All six survey events present quantified evidence showing very extensive lengths of single-track operation along the western section of Hamsland. The evening data is perhaps the most concerning as this is the best representation of the overnight starting condition that can be expected for the morning peak hour period. The consistency of the evidence gathered indicates that this is not a freak event – something similar will be repeated every night of the year. The evidence gathered also suggests that single-track operations will be experienced to some extent all day, every day – and, at times, very extensively so.

4.4 The existing significant hazard of extensive single-track operation along long lengths of Hamsland has developed over the years as car ownership levels have risen and it may be making a step change for the worse currently if COVID accelerates a permanent move to more working from home, which will further increase daytime parking levels. Residents have had no option other than to learn to live with the current situation, and they are very aware of the risks and delay that this brings with it, hence the strength of their objections regarding any development that might make the existing unsatisfactory situation worse. It is fundamentally ill-conceived to propose allocating SA29 for a development of this scale, with the evident increased risks to pedestrians, car users and property.

4.5 Increased flows and any increased overspill parking on this section of Hamsland would lead inevitably to more head-to head vehicular conflicts, which is already a significant safety concern for residents. The only means available in Hamsland to resolve these conflicts are for vehicles either to:

- reverse back to a passing place, if one exists, or to back out onto Lewes Road or into Challoners. This may involve several vehicles at a time, perhaps having to reverse c.30 to 40 metres, and represents an unacceptable safety risk; or to
- drive up the kerb onto the grass verge and, if one or both of the vehicles are large, potentially onto the pavement. This is also inherently very unsafe, not to mention destructive, as shown clearly in the two photographs of the current situation in Hamsland contained in Figure 2 of this Technical Note, which shows vehicle tracks up over the grass verge and encroaching onto the footpath in the centre of the straight between the two blind bends in Hamsland.

5 Conclusion

5.1 There is an inconvenient truth that the sole vehicular access to the site along Hamsland is a significant and potentially pivotal problem regarding the ability to deliver a safe means of access to this site. There has been too quick a move by MSDC and the prospective developer to rely on one set of helpful data, in the form of a parking survey carried out in mid-July 2019, and to seek to sweep this issue quietly under the carpet, despite numerous representations that this survey was wildly at odds with day-to-day local experience.

5.2 Many representations have been made to this effect, repeatedly and formally, during MSDC's site allocation DPD process, to Rydon homes concurrent planning application and to Horsted Keynes Draft Neighbourhood Development Plan Regulation 14 consultation. To date, there has been no attempt by the promoters to validate this data in order to allay the concerns that have been expressed.

5.3 A simple parking survey carried out over three days in February 2021 has enabled quantification of the gulf between the summer 2019 data set and current data. Whilst COVID may affect this data to some extent during the day, it is unlikely to have a material effect on the overnight data which, according to WSCC's guidance on the subject, is the data that matters as this is the starting point for the morning peak hour.

5.4 In summary, this simple survey over three days demonstrates that:

- The levels of parking stress along Hamsland are very high, particularly the eastern section in the vicinity of the proposed site access, such that it was often found to be at or close to 100% occupancy. There is no ability to tolerate any overspill parking from any development of SA29.
- The extent of parking on the western section of Hamsland creates single-track two-way operations over most of its length most of the time. The longest unbroken lengths of single-track operation with no passing places were observed at c.85 to 90m.

5.5 These long single-track sections, with forward visibility potentially severely restricted by parking on the inside of two bends, are already a significant safety concern for the residents of Hamsland and Challoners. Against this context, it is simply not credible to allocate SA29 for a development of 30 dwellings, that, according to the analysis on the supporting Transport Statement, could add as much as 56% to the additional morning peak hour trips to this link. In absolute terms, these are not large numbers, but the extensive single-track operations on the western part of Hamsland make it an extraordinary section of road with endemic safety problems and with a capacity which is way below conventional norms.

5.6 Paragraph 8.12 of the Transport Statement asserts "In conclusion, the site can achieve safe and suitable means of access for all modes and the development will not materially impact on the operation of the local highway network. As such there are no transport reasons why the development should not be permitted."

5.7 The absence of any Road Safety Audit assessing the impacts of adding development-related traffic to the existing unsatisfactory single-track operation on the western section of Hamsland is a startling omission and a clear "transport reason" why this site should not

be considered for allocation without a more robust understanding of the impacts of such a development.

5.8 In the absence of such an assessment, and in the context of the concerns that have been raised repeatedly about safety on the western length of Hamsland, there has been no robust demonstration that the allocation of SA29 would:

- Enable *"safe and suitable access to the site (to) be achieved for all users"* (NPPF108)
- "*Minimise the scope for conflicts between pedestrians, cyclists and vehicles"* (NPPF110c)
- Provide *"a transport network that feels, and is, safer and healthier to use"* (WS Local Transport Plan 2011 to 2026, 1.2.4)
- Allow for a *"scheme (that) protects the safety of road users and pedestrians" (*MS District Plan 2014 – 2031, DP21)

5.9 To the contrary, the additional parking survey data lends credence to the view that the risks presented by extended single-track operation along the western stretch of Hamsland, which is already a significant safety concern for residents, will be exacerbated by the allocation and potential development of SA29 for a further 30 homes at the end of this extensive cul-de-sac, with no mitigation proposed for these increased risks. As such, the allocation of SA29 for 30 dwellings, with no mitigation of the risks on the western section of Hamsland, is unsound as this singularly fails the national, county and district policy tests set out above regarding the imperative to provide safe and suitable access to proposed development.

Paul Fairbairn 3rd July 2021

Mid-Sussex District Council: Sites Allocation Draft Development Planning Document

Proposed Allocation of SA29 Land South of St Stephen's Church, Hamsland, Horsted Keynes

Hamsland Parking Survey

5th, 6th & 7th February 2021

Hamsland access route to proposed site

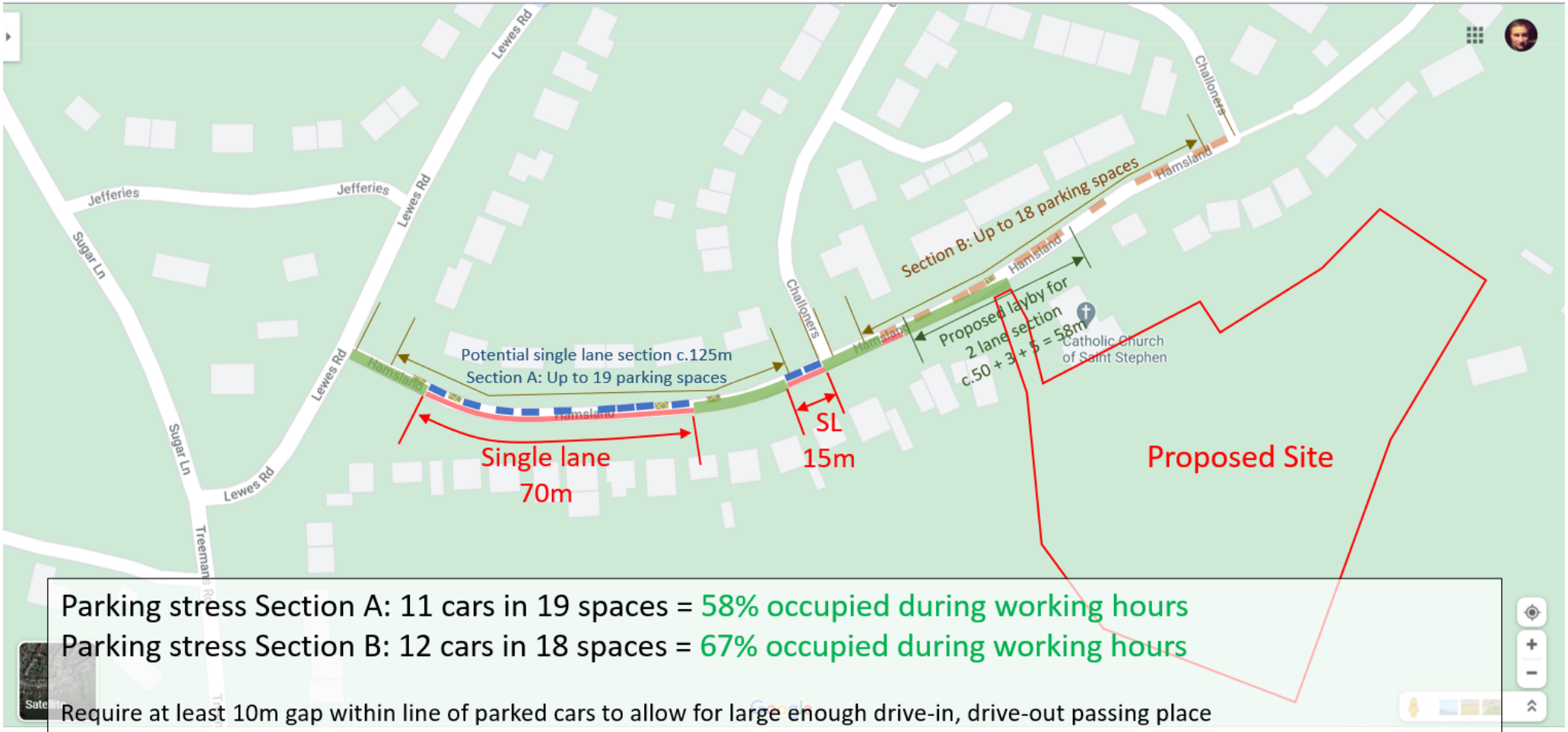
Extract from Highway Code: Rule 243

DO NOT stop or park:

- anywhere you would prevent access for Emergency Services
- opposite or within 10 metres (32 feet) of a junction, except in an authorised parking space
- where the kerb has been lowered to help wheelchair users and powered mobility vehicles
- in front of an entrance to a property

Parallel parking: widespread guidance is to allow 6 linear metres length per space for reverse in, drive out parking
Permits up to **37 parking spaces** complying with Highway Code, not the 42 parking spaces used in the parking stress survey
Passing places in single lane sections: Look for at least 10 linear metres to permit drive in, drive out passing manoeuvre

Parking survey: 09:15-09:30 Friday 5th February



Parking stress Section A: 11 cars in 19 spaces = 58% occupied during working hours

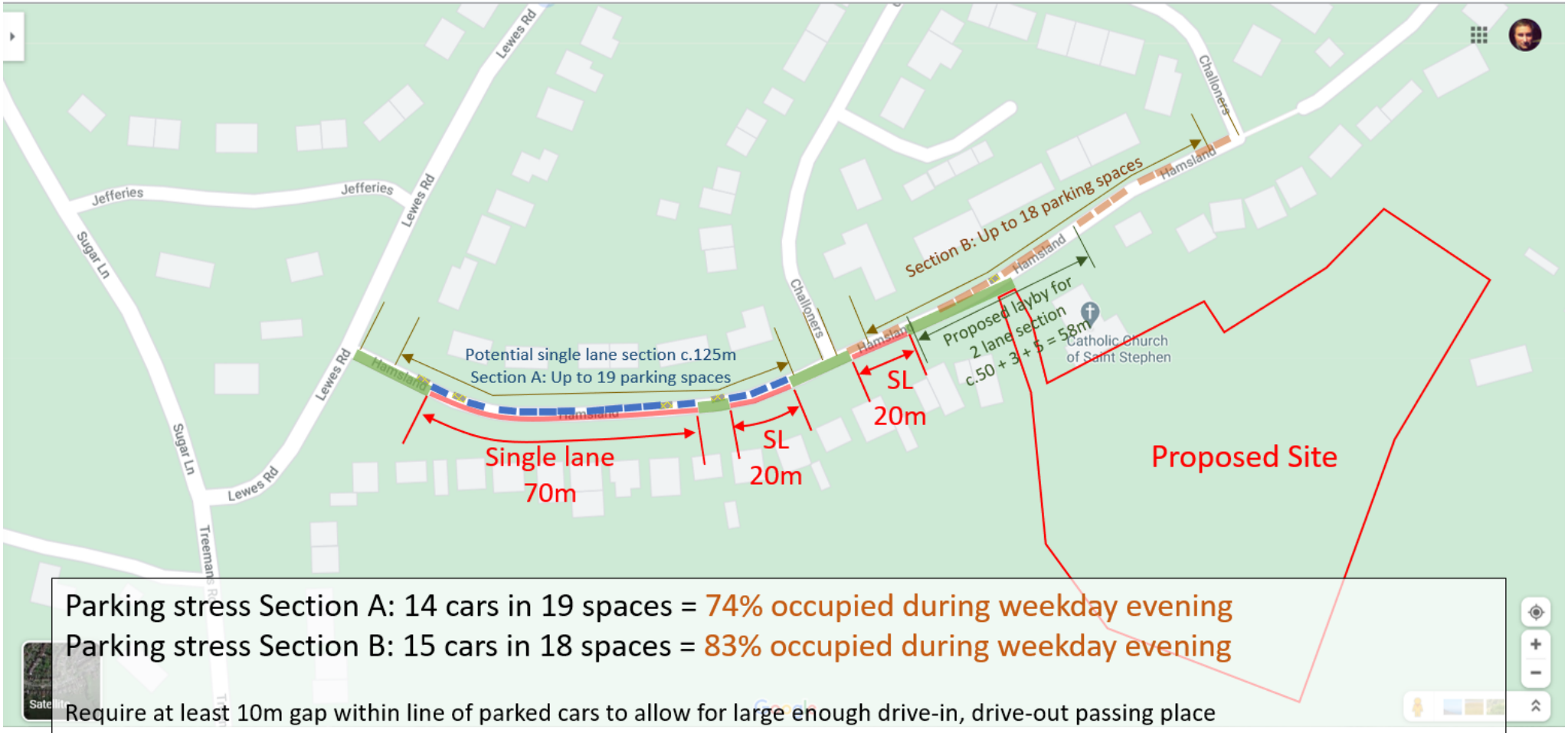
Parking stress Section B: 12 cars in 18 spaces = 67% occupied during working hours

Require at least 10m gap within line of parked cars to allow for large enough drive-in, drive-out passing place

Significant single lane lengths: c.70m single lane length with blind bend

c.15m single lane length straight

Parking survey: 18:15-18:30 Friday 5th February



Parking stress Section A: 14 cars in 19 spaces = 74% occupied during weekday evening

Parking stress Section B: 15 cars in 18 spaces = 83% occupied during weekday evening

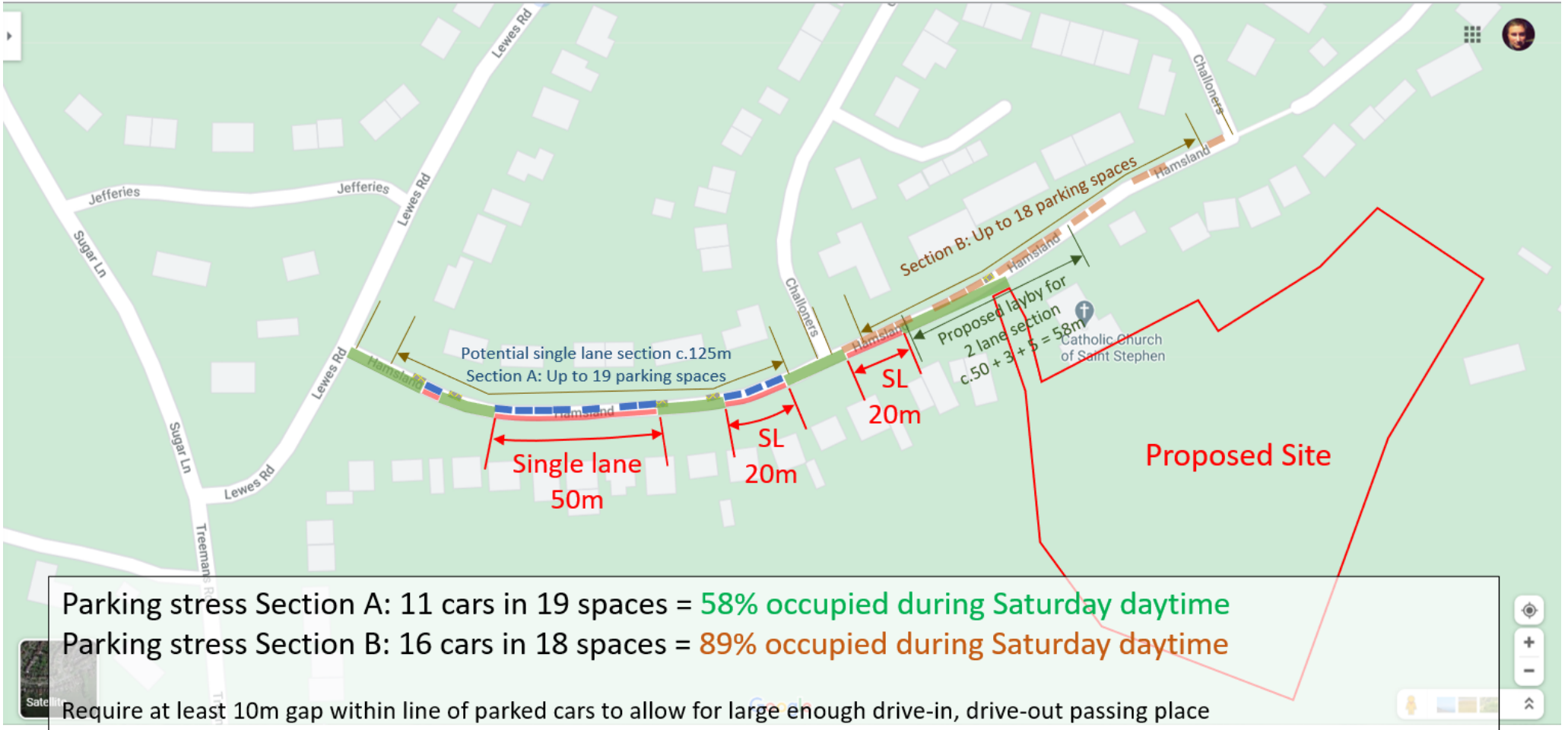
Require at least 10m gap within line of parked cars to allow for large enough drive-in, drive-out passing place

Significant single lane lengths: c.70m single lane length with blind bend

c.20m single lane length with bend

c.20m single lane length straight

Parking survey: 09:30-09:45 Saturday 6th February



Parking stress Section A: 11 cars in 19 spaces = 58% occupied during Saturday daytime

Parking stress Section B: 16 cars in 18 spaces = 89% occupied during Saturday daytime

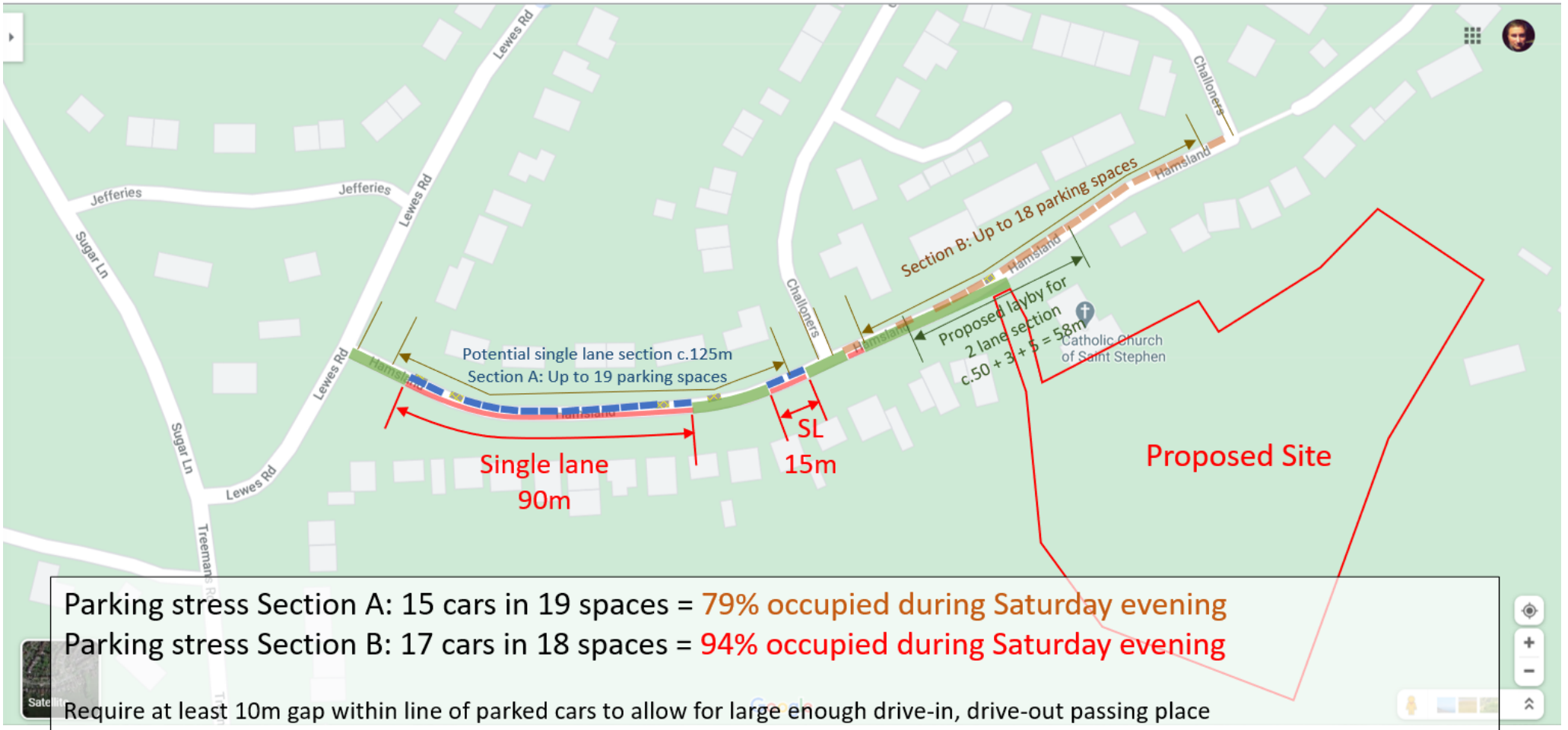
Require at least 10m gap within line of parked cars to allow for large enough drive-in, drive-out passing place

Significant single lane lengths: c.50m single lane length with bend

c.20m single lane length with bend

c.20m single lane length straight

Parking survey: 20:30-20:45 Saturday 6th February



Parking stress Section A: 15 cars in 19 spaces = 79% occupied during Saturday evening

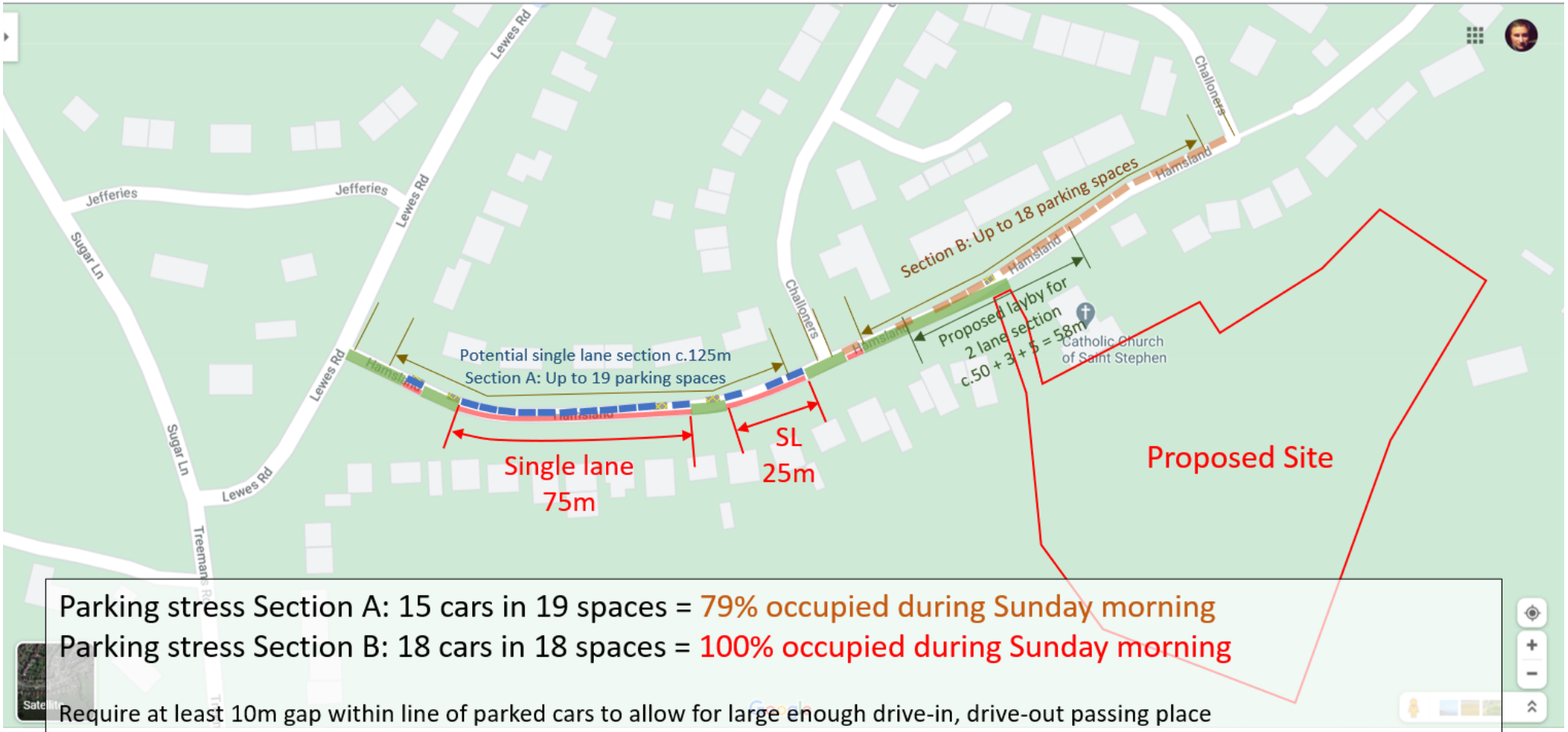
Parking stress Section B: 17 cars in 18 spaces = 94% occupied during Saturday evening

Require at least 10m gap within line of parked cars to allow for large enough drive-in, drive-out passing place

Significant single lane lengths: c.90m single lane length with blind bend

c.15m single lane length straight

Parking survey: 09:30-09:45 Sunday 7th February



Parking stress Section A: 15 cars in 19 spaces = 79% occupied during Sunday morning

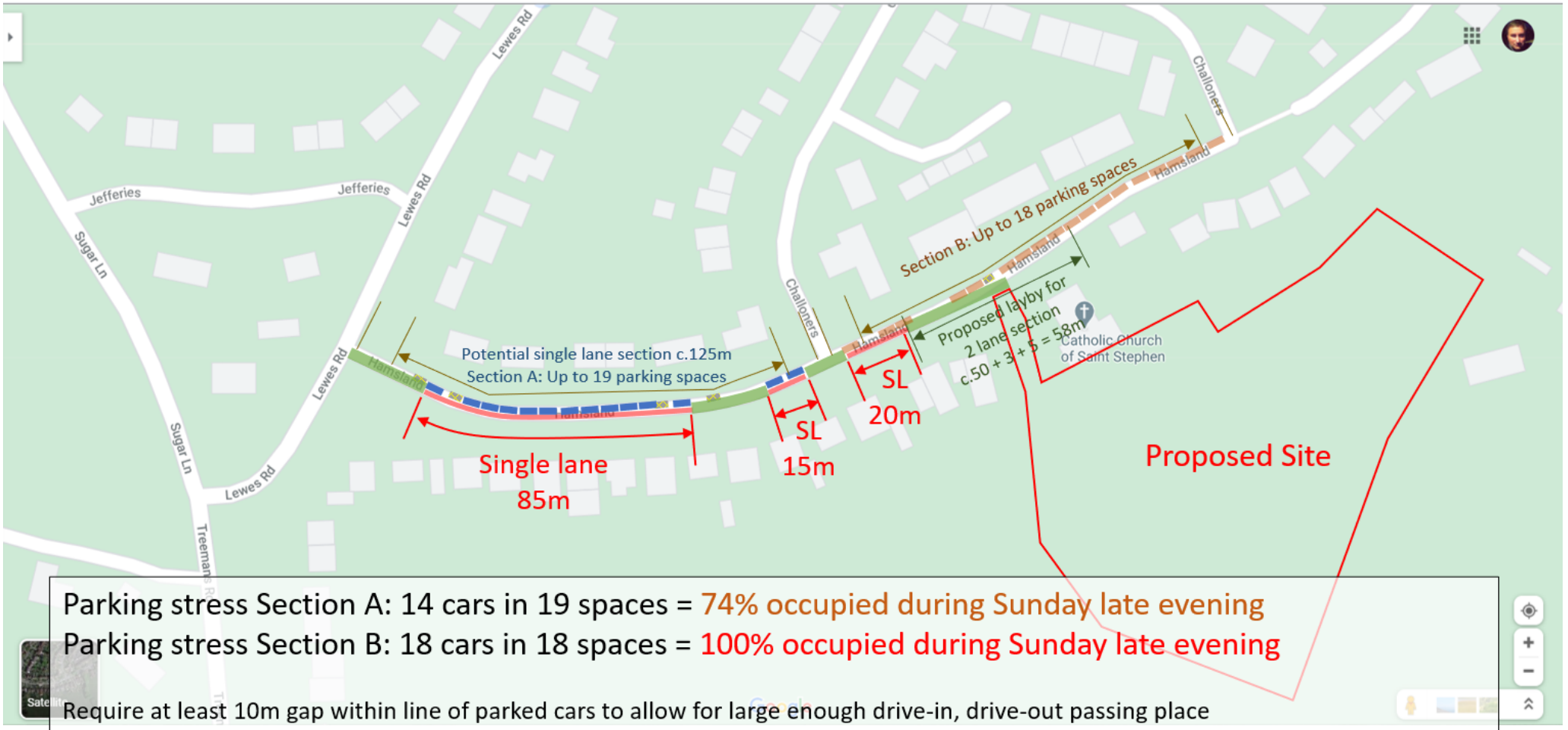
Parking stress Section B: 18 cars in 18 spaces = 100% occupied during Sunday morning

Require at least 10m gap within line of parked cars to allow for large enough drive-in, drive-out passing place

Significant single lane lengths: c.75m single lane length with blind bend

c.25m single lane length with bend

Parking survey: 21:45-22:00 Sunday 7th February



Parking stress Section A: 14 cars in 19 spaces = 74% occupied during Sunday late evening

Parking stress Section B: 18 cars in 18 spaces = 100% occupied during Sunday late evening

Require at least 10m gap within line of parked cars to allow for large enough drive-in, drive-out passing place

Significant single lane lengths: c.85m single lane length with blind bend

c.15m single lane length straight

c.20m single lane length straight