

Statement by Mrs Jacqueline Simmons.

Regulation 19 Submission References 1189185, 1191239, 1191333, 1191339, 1191343.

Matter 4: Transport

Question 45

With regards to the 3 options,

- a) The Council would have great difficulties finding the necessary funds to finance *Option b*.
- b) *Option c* would also be difficult as the bulk of new housing is in more dispersed rural areas with higher vehicle ownership per household, such as DPSC3-7. Such measures proposed are most effective in densely populated urban areas with lower vehicle ownership per household with access to more established public transport options.
- c) *Option a* would be the most sustainable and achievable as growth could then be focused in or besides larger urban areas with higher populations and more transport options such as rail.

Question 46.

- a) MSDC uses a calculation of Home Working traffic reduction of 20% for every proposed site in its *Transport Study Scenario 6 Report paragraphs 3.3.1 to 3.3.3*. This is based on a study showing the Mid Sussex population has a lower level of out of work benefit claimants and a higher level of employed professional SOC Major group 1-3. The assumption is made that this is evenly distribution around the district. This is not correct. Such economic group tend to cluster in particular areas in the district, identified by the differing house prices, sizes and curtilage in different areas. The reduction figure is therefore to generalised to be able to apply it to individual allocated sites.
- b) The 80% reduction in trips due to new primary schools is also too generalised as the geographical, social and economic make up of the catchment area for each school differs.
- c) Trip reductions are based on studies in the urban areas of Crawley & Horsham with a greater access to facilities and public transport options so it cannot be considered sound for rural areas.
- d) The studies have only looked at road junctions and not at the impact of roads through villages such as Sayers Common and Hurstpierpoint High Street which is a conservation area. Please refer to my Reg 19 submission ref section d *Highways and Roads* pages 21-27 and section e *Conservation Areas* pages 27-30

The transport evidence given is therefore too generalised to be considered robust and justified to be applied to specific individual sites in decisions to include them in the DP. More specific and detailed evidence is needed to make sound and sustainable judgements in this respect and until that is done policies relating to sites chosen for inclusion cannot be considered sound.

Question 47

There is conflict about MSDC's definition of a 20 Minute Neighbourhood.

- a) Page 18 paragraph 2 of the DP states, "*Research has shown that 20 minutes is the maximum time that people are willing to walk to meet their daily needs*" Source quoted is <https://www.planning.vic.gov.au/guides-and-resources/strategies-and-initiatives/20-minute-neighbourhoods> which is The Victoria State Government in Australia's strategy. However, that authorities' guidelines advise that "*The 20-minute neighbourhood is all about 'living locally' and enabling people to meet most of their daily needs within a 20-minute return walk from home*".
- b) Page 20 paragraph 5 of the DP advises that the concept has been used in its Site Selection Methodology to score access to services and facilities and that "*Sites which include on-site facilities or can access such facilities within a 10-minute walk achieve a 'very positive' score against these criteria, with those*

greater than a 20-minute walk achieving a 'negative' score" That would match the guidelines if 10 minutes refers to a single one way journey and twenty to a return journey.

- c) In its site allocations reviews and decisions however, the results when matched with the reality of the actual locations, show that MSDC has used 20 minutes to mean a one way journey (resulting in a 40 minute return journey) which is contrary to the 20 minute neighbourhood policy guidelines.
- d) The DP is unclear what percentage of the new houses in a site would have to be within 20 minutes return journey of a particular facility to make such an assertion valid.
- e) The lack of clarity of the actual definition of what is meant by a 20 minute journey therefore has a major effect on the planning policies in the District Plan which rely on that definition and on the method of site selection.
- f) Please also see my reg 19 submissions refs 1191239 & 1189185 section 2c '*20 minute communities and sustainability*' pages 12-17 for further issues with the 20 minute concept which MSDC and its DP have not still not clarified or evidenced.
- g) It is still the case that the 20 Minute Neighbourhood concept is not government policy. The government has not issued an endorsement of it, given guidance on it, or instructed Local Authorities to use it in their District Plans. It is not mentioned in the NPPF.
- h) The concept of a 20 Minute Neighbourhood should not be given weight or precedence over or be used to replace the NPPF and government planning policy in MSDC District Plan. To make it a policy with weight means that the DP is not consistent with national policy and therefore cannot be considered sound

The MSDC concept of a 20 Minute Neighbourhood is unclear and ambiguous. It has not been applied in a standardised fashion. A 20 minute return journey could reduce vehicle journeys. A 40 minute one would not. When such an unclear policy is applied to sites, such as DPSC3-6, it cannot be justified or effective as the housing in the sites is too dispersed from facilities and infrastructure.

Question 48.

The processes proposed by MSDC to prevent the transport impacts would not be viable. This is because of the chosen location of the Sustainable Communities, in particular DPSC3, and the costs involved.

- a) The location of DPSC3 is remote from category 1 towns and category 2 villages. MSDC claims high growth potential for Sayers Common but this term is very relative as it is a small village to start with and right on the western edge of the least populated part of the District.
- b) The DP building of the 2543 new houses in Sayers Common would result in an 827% increase in house numbers. (Please refer to my Reg 19 submission 1189185 Section C *20 Minute Communities and Sustainability* page 12 paragraph 4 for calculations). That growth is not to be accompanied by an equal increase in sustainability.
- c) Sayer Common has a higher level of 2 or more vehicles per household than the category 1 towns (see 2021 census figures in **Appendix A** below). Each work age adult needs their own form of transport for work etc.
- d) It already has facilities such as a shop, village hall and pub which existed at the time of the census. Building more of the same facilities would not have much effect on that percentage ownership.
- e) A new secondary school would make minor difference as currently children in the village qualify for a free school bus. The school's wider catchment area would mean more vehicle traffic from outside the village. A new primary school would not be within a 20 minute return walk for all children. It would lead to the closure of the existing Albourne and Twineham Primary Schools and therefore more vehicle journeys into the development.
- f) Buses with fixed and limited timetables and routes are not a flexible form of transport. They dictate the hours of and location where a person can work. Private vehicles do not. Buses are only used if there is no other vehicle option.

- g) There are not enough retail facilities proposed to change shopping habits and they would be more expensive as well. Higher prices do not help low income families. Low paid jobs require more flexibility of hours and locations than public transport would be able to provide.
- h) Most new businesses will come from urban locations with existing jobs and used to easy access to a wider range of retail, entertainment and hospitality than provided on site.
- i) There is no guarantee new employment on site would go only to residents. BAHCC in their *Duty to Cooperate Document section 4 Strategic Matters – Employment section 22* confirms that it sees the new business in the site supporting employment growth in their own area, resulting in commuting into the site.
- j) The site relies too much on new infrastructure for it to be sustainable. The finance and delivery of this is outside of MSDC control. There is a very high risk of single point non delivery, any of which could make the site increasingly non sustainable. This would not reduce vehicle levels but increase them.

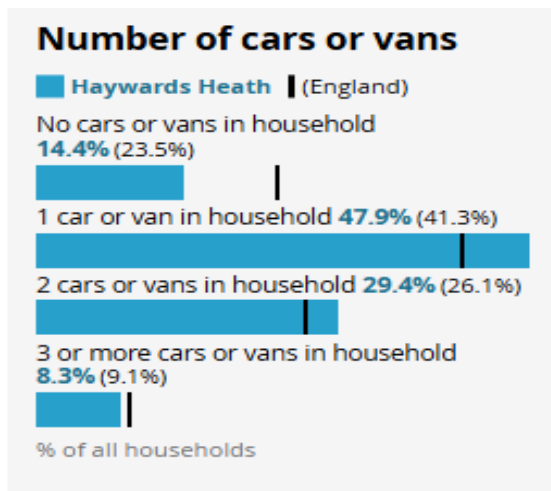
The physical location, in relation to other settlements, and the above reasons have not been fully considered by MSDC when allocating DP3C3t as a Sustainable Community. It would not lead to any significant drop in vehicle journeys but would introduce at least another 4570 vehicles into the settlement at the current ownership levels outweighing any possible small transport gains made. This would make the DP as a whole unsound unless MSDC revisit their spatial strategy as to where they locate the new houses they require.

Question 49

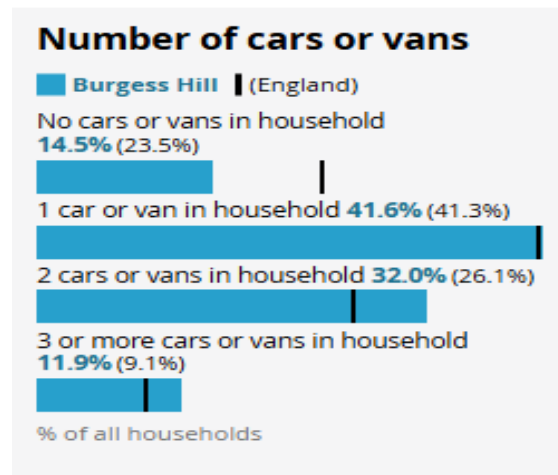
There is no certainty given the above, a lack of public funding, and economic conditions. All out of MSDC control. New infrastructure can take decades to be built and also takes away funds from the maintenance and running of existing facilities elsewhere in the district. There is a limit to how much funds developers or public bodies can generate. Sites such as DP3C3 are not sustainable with regards to transport and the policies and assumptions with regards to transport are therefore not sound.

Appendix A – Numbers of vehicles per household as recording in the Office For National Statistic 2021 Census and copied from their website

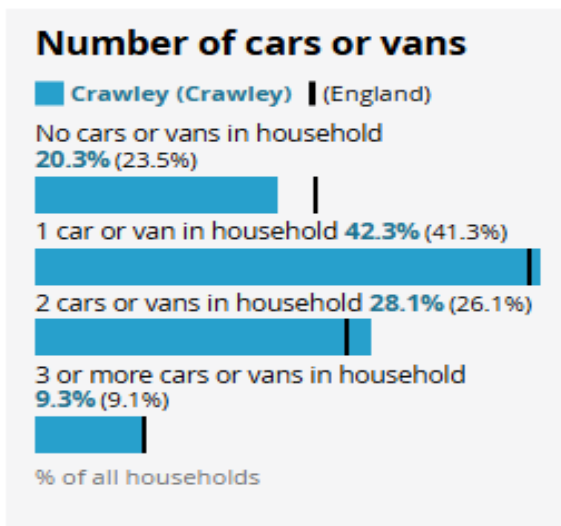
Haywards Heath Built Up Area



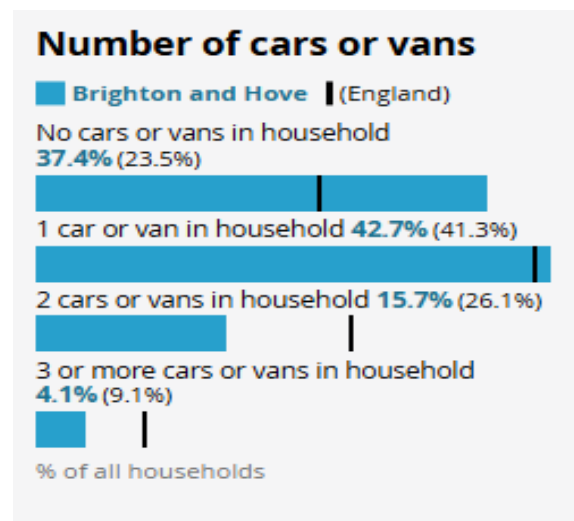
Burgess Hill Built Up Area



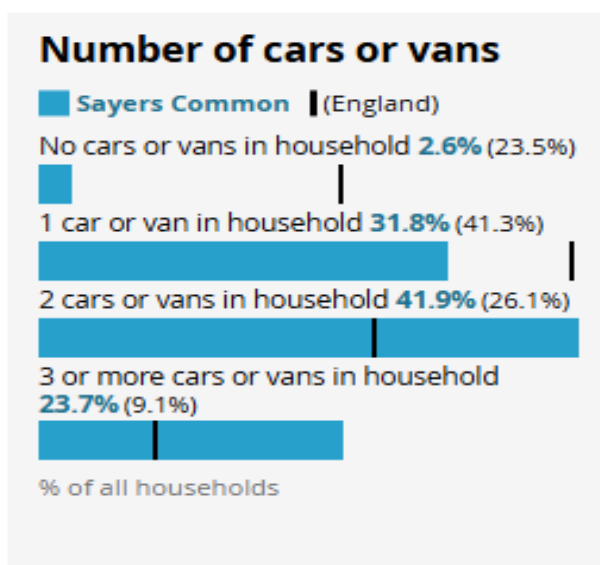
Crawley Built Up Area



Brighton & Hove Built Up Area



Sayers Common Built Up Area



Albourne Built Up Area

