



# WARNHAM PARISH COUNCIL

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5<sup>th</sup> September 2018

Dear Sir/Madam,

**Re: DC/18/1700 – Erection of 14 houses in Kingsfold**

## **Objection**

Warnham Parish Council strongly objects to planning application DC/18/1700 – erection of 14 houses in Kingsfold.

The proposed development is contrary to national, district and parish planning policies, and the constraints of the location and the characteristics of the A24 in Kingsfold render the site undesirable for a development of 14 houses.

## **Planning Policies**

### **1. The National Planning Policy Framework (NPPF), July 2018.**

The framework has a presumption in favour of sustainable development. The site at Kingsfold cannot offer the choice of facilities and transport modes to be considered as sustainable.

Considerations include:

- a) Kingsfold is remote from many facilities and the proposed development will be a car dependent society. The bus service is mostly hourly which is inadequate for many daily needs and the service to Horsham is not routed to provide convenient access to the station and hospital. Parking at Horsham Station is very limited. Kingsfold's only facility is The Owl public house.
- b) The nearest primary school is in Warnham village which is not within cycling or walking distance for young children nor are there safe footpaths to the school. Road access is via the A24, Marches Road and Mayes Lane, none of which are safe for cycling.
- c) There is no children's playground in Kingsfold.
- d) Kingsfold has no shop. The nearest shop for daily household needs is in Warnham village, beyond comfortable walking distance.

e) Church, social, recreational and sports facilities within the parish are also located in Warnham village.

f) The hamlet of Kingsfold is severed by the A24. It is exceedingly unsafe to cross the road. There are no safe crossing points. Use of public transport requires the crossing of the road. The location of the site does not encourage walking or cycling which is promoted through the NPPF. The Transport Statement acknowledges that 'the local highway network in the vicinity of the site is subject to a 40mph speed limit. As such cycling is likely to be restricted to confident/experienced cyclists only'.

g) The site has to gas mains or sewage. An on-site LPG facility is to be provided, which is expensive alternative, and a sewage treatment plant is to be installed, both with associated maintenance requirements.

The NPPF states: 'Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the plan), permission should not normally be granted. Local Planning Authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.' This is not the case in Horsham.

## **2. The Local Plan is the Horsham District Planning Framework (HDPF).**

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HDPF makes no allocation of sites for development in Kingsfold and hence there is a presumption against development in Kingsfold.

Policy 2 endorses the concept of sustainable development. As indicated above the site cannot be considered as sustainable.

Policy 3 identifies settlements suitable for development. Kingsfold is not included.

Policy 4 requires developments to be on land allocated in the Local Plan or

Neighbourhood Plan. Neither plan allocates land in Kingsfold.

Policy 15 identifies the provision of 1500 homes through Neighbourhood Plans. Warnham parish is able to provide for a fair share of the 1500 homes in Warnham village and in accordance with the provisions of the HDPF; there is no requirement for the development of 14 houses in Kingsfold.

**3. The Warnham Neighbourhood Development Plan (WNDP)** is currently (September 2018) at the final Regulation 16 Statutory Consultation Stage. The WNDP identifies an allocation of around 50 dwellings to a site adjacent to the defined Built-Up Area Boundary, in accordance with the HDPF. The WNDP considered 31 sites for possible development and comprehensively evaluated these against 50 agreed criteria. Ten sites are in Kingsfold, but none were short-listed for further consideration as they failed to meet the basic requirement for sustainability due to the absence of key facilities in Kingsfold. The site fails to meet or is in conflict with the requirement of the following policies.

Policy W1 - development shall be focused on Warnham village.

Policies W2 and W6 - around 50 dwellings will be provided on a site north of Freeman Road, Warnham.

Policy W3 - the proposed housing sizes are at variance to those of the WNDP.

## **Horsham District Secondary Settlements**

Horsham District Council is consulting on the concept of introducing Secondary Settlements to a revision of the HDPF. The consultation paper identifies a notional built-up area boundary to existing housing in Kingsfold within which small infill developments of up to 5 dwellings may be

permitted. The outcome of the consultation is not known but the proposed development would be contrary to the draft Secondary Settlement concepts due to its size and location. The Parish Council and Kingsfold Residents Association oppose the concept which would be in conflict with the HDPF and Neighbourhood Plan. It is incorrect of the Transport Statement to report that HDC has recommended that Kingsfold as a Secondary Settlement.

## Highway Considerations

The Transport Statement accompanying the application concludes that the site is a sustainable location and suitable for non-motorised road users (both cyclists and public transport users), providing sustainable access to: leisure facilities including all in Warnham, Rookwood golf course (with clubs?), education (Warnham primary school and Capel pre-school - with children?), and the doctors' surgery in Capel (for the sick and elderly?). The A24 is manifestly unsuitable for walking and cycling to the extent of rendering the site unsustainable. The Statement also suggests that cycling and walking may be used for employment. This may be so to a limited extent but the nature of employment available in and close to Kingsfold is unlikely to be attractive to the many of the potential purchasers of properties in the proposed development.

Kingsfold is severely severed by the A24. It is not possible to cross road safely at any location in the built-up area. Traffic speeds are high for a hamlet with frontage development, about 40 mph average; traffic is mostly continuous and visibility is inadequate. The uncontrolled pedestrian crossing proposal on the A24 south of The Owl is presumably the best that can be achieved although the Transport Statement acknowledges that visibility remains substandard. It is not at a location where pedestrians would wish to cross and hence is unlikely to be used. It is in an open area some 70m south of the Marches Road junction, 30 m south of the southbound bus stop and 22m south of the northbound bus stop. The 'crossing' is merely a location where dropped kerbs and tactile paving are to be provided. It will have no signal control, traffic island or road markings and will be unsafe. The only acceptable location that could be considered for a crossing is at the focus of current crossing movements which is at The Owl and visibility at this location is limited. An earlier proposal of the applicant showed a crossing with a traffic island in the vicinity of The Owl. Presumably this proposal has been dropped.

## Traffic analysis

The traffic analysis indicates that the development would generate a maximum trip rate of only 7 vehicles per hour. This is a low rate of traffic generation more appropriate to a location where non-vehicular transport is a transport option. The Transport Statement acknowledges that the trip rate analysis has assumed an edge of town location. This is clearly wrong and a rural location should have been used. The development will be heavily car dependent with increased traffic generation. The analysis shows that traffic from the site will wait on average 20 seconds to find a gap in the A24 traffic. This is a long wait and likely to encourage unsafe driving.

There is substantial development constructed or planned on the southern borders of the parish: about 5000 houses and associated facilities. Traffic analysis submitted to HDC shows that these developments will add to the traffic on the A24. This extra traffic should be allowed for in the traffic predictions. It is not sufficient to adopt overall regional growth factors to reflect this

specific, local, identifiable traffic. The increased traffic will add to the accident potential, worsen operation of the proposed junction and increase delay times at the junction.

The close proximity of the highway access to Priors Wood could generate a conflict of traffic movements. This accident risk could be ameliorated if the access to the site is located further north within the site.

The analysis reports 7 death or injury accidents over 5 years. This accident rate is not insignificant and is of concern to the residents. The statistics omit non-injury accidents of which there are many. The Transport Statement acknowledges that this is typical of a primary route in a rural area but, to be noted, not one that provides a suitable environment for a new priority junction for residential development. Previous applications for new residential access on to the A24 have been refused.

Observation of the tyre marks at the Marches Road junction are indicative of the manner in which drivers emerge from Marches Road to turn south to utilise the gaps in the A24 traffic. The peak hourly traffic count records 26 vehicles a minute. This is a high traffic flow in which to introduce a new priority junction.

## **Road Safety Audit**

The Stage 1 Road Safety Audit is inadequate in that it fails to comment on the potential risk of access from the site into the high volume/high speed traffic on A24.

## **Aircraft noise**

Kingsfold lies almost due west of Gatwick, in close proximity to a flight path. Planes are at a low level over Kingsfold and this generates a very high exposure to aircraft noise. Consequently it is not a desirable location in which to build additional housing. The southern part of the parish is affected to a significantly lower level and hence is a preferred location for development.

## **Flora and fauna**

The application addresses consideration of the disruption of existing flora and fauna. To compensate the applicant proposes that wild flowers be planted on new lawns. This is not likely to be acceptable to the new residents who are most likely to expect lawns to be weed free. It is also suggested that bird and bat boxes be erected. Specific measures to provide these need to be detailed.

The site is in an elevated position and will be highly visible from locations to the east. It is therefore important that lighting be designed to reduce light exposure external to the site. Intrusive lighting is also disruptive to the behaviour of the bat population. This also needs to be addressed in the application.

## **Community benefits**

The existing vehicle actuated speed sign (VAS) in the southbound direction is to be relocated as part of the development. The Statement shows a northbound speed in excess of 40 mph. This is an intimidating speed for a hamlet with many frontage developments and with narrow footpaths. An additional VAS to address this traffic is requested by the Kingsfold Residents Association.

Parking spaces for some residents in Kingsfold is scarce. It would be some compensation to the community if the development provided additional public parking provision, either with extended lay-byes or on-site provision.

## **Conclusion**

The application puts an unrealistic supportive gloss on the inadequacies of the site. There are many reasons to conclude that the site is unsuitable for development and the application should be refused.

On behalf of Warnham Parish Council.

Yours faithfully,

A handwritten signature in cursive script that reads "Ashley Brooks".

**Mrs Ashley Brooks**  
**Clerk to Warnham Parish Council**