

PLANNING APPLICATION DM/25/1129 FOXHOLE FARM DEVELOPMENT

Particular Objections to the Applicants' Transport Assessment by Bolney Parish Council

Summary

1. Bolney is a small village in the countryside, the proposal will not change that from a transport point of view. It has minimal transport links and those who live there rely very heavily on the private car with the majority of households having one car per adult. There are also no cycle ways or pedestrian pavements to nearby villages. Bolting on a new development beside it of 200 dwellings is simply not going to change that. The efforts that the applicants have made to disguise that do not and cannot overcome that. The applicants go to great efforts to show that Bolney can be made accessible from the site by foot and bicycle but this does not help, having got to central Bolney (which would not be without difficulty) there is minimal public transport to go anywhere else.

The proposed Foxhole Farm Development is a 200 dwelling development which is just going to introduce a great number of cars onto the road network and there is little possibility of the residents being able to use sustainable public transport. Thus the applicants have failed to demonstrate that they can, by using a vision-led approach or otherwise identify suitable transport solutions or a sustainable development.

The location of the site and the lack of sustainable transport infrastructure mean that the proposed development will not provide a genuine choice of transport modes contrary to the requirements of the NPPF. The proposed development will therefore be reliant on the private car and would lead to very few journeys being made to destinations outside of the site and Bolney village by active or sustainable modes of travel.

The proposals do not accord with national, regional and local transport policy with regard to locating developments in locations which are or can be made sustainable through limiting the need to travel and offering choice of transport modes.

In summary this proposed development cannot be sustainable in this location and therefore fails Policy DP21 of the District Plan.

Section 2 Transport and Movement Vision

2. The objective of the development includes to "*provide a choice of safe, attractive and sustainable transport options to meet daily needs*" (2.6.1 last bullet). The applicants have failed to say what these are let alone explain how they may be provided.
3. The applicant's vision/anticipated outcomes (2.8.1) include "*Fewer vehicle movements than would otherwise be the case on the external road network*". This cannot be the case, the development will just add to the traffic as, inevitably, have the Magdalane Rise and Davey Drive developments on the London Road, Bolney although the latter have excellent step free foot access to the school, church and cricket club which the proposed development does not.

Section 3 Policy Context

4. Para 115 (3.2.3) a) *Sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location.* Bolney has no sustainable transport modes and therefore neither does the proposed development.
5. Para 116 (3.2.4) *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety.....*The PC contends that there would be an unacceptable impact on highway safety. It is noted that as far as we are aware there are no other developments in the vicinity leading directly onto the A 272 where there is a bend, restricted visibility and so much highway activity (busy service station, Bolney Chapel Road, Foxhole Lane, industrial estate proposed Foxhole Farm Access, 14 residential driveways all within approximately 250 metres). Volunteers took a traffic survey of both the movements in and out of Magdalene Rise/Davey Drive and movements in and out of the service station/industrial estate on the A 272. The latter is extremely busy and in a hazardous position and during the morning peak showed an average of 44 vehicles/hour in the morning peak and in the evening peak an average of 63 vehicles/hour entering and exiting the area. Appendix 2 contains the details of the survey and contains notes of hazardous events witnessed during this short period including blockage of the westbound lane of the A 272 nine times in one morning peak period of one hour. It is noted that this blockage extended towards the proposed access of the development and to the island of the proposed unregulated crossing thereby making manoeuvring past the proposed central island impossible for westbound traffic. This is an extremely busy and hazardous part of the A272 and exactly where the access to the proposed development is situated. Just to emphasise the point, in this area of 250m there is already the Puffin Crossing, the Bolney Chapel Road/Foxhole Lane junction, the industrial estate, the drives from the 14 residences as well as the service station and here the applicants propose to add an unregulated crossing and access to 200 dwellings. This represents an unacceptable additional safety hazards.
6. The proposed development would have a very significant effect on the usage of the Puffin Crossing across the A 272. The nearest shop to the development is that at the service station and with 400+ new residents living close to it there will be significantly increased usage of the shop and the crossing. Moreover, use of the proposed uncontrolled crossing near to the proposed access by these residents will cause danger to both pedestrians and traffic on the A 272. It is submitted that most sensible residents of the development will use the Puffin Crossing. Such usage will cause delay and disruption to the A 272 and be a hazard to both pedestrians and vehicles on the A 272.

The NPPF

7. NPPF section 9 –“Promoting Sustainable Transport” is very short, just 3 pages.

Para 109 states *Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places*”. It then goes on to say what this should involve which includes:-

c) understanding and addressing the potential impacts of development on transport networks

d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage- for example in relation to scale, location or density of development land that can be accommodated

e) identifying and pursuing opportunities to promote walking, cycling and public transport use;

8. Try as they may the applicants are not able to demonstrate that residents are able to use public transport or active travel (walking, wheeling and cycling) to get to their destinations other than Bolney village and the limited facilities it offers. The only possible exception to this is cycling south to Burgess Hill although the train station is 6 miles away, beyond the cycling distance of most. The A 272 is far too busy and dangerous for cycling west to Cowfold or east to Haywards Heath, there are no towns to the north which are within cycling distance.
9. Bolney with or without the Foxhole Farm development cannot be made sustainable from a transport point of view. There is just not the public transport that would be available at larger settlements. The development is in the wrong place.

Points of Access (4.3 page 16)

10. Access arrangements are problematic as is shown by the Applicants at figure 4.1. and addressed at paras 5 and 6 above. The applicants have considered 3 options and believe that the option with a turn right lane and a ghost island is the best option. They have considered splay and sight lines all of which appear to be marginal at best.
11. It is contended that (i) the traffic to/from the service station/shop and industrial estate and its effect has not been properly taken into account and (ii) that the traffic using the access at peak times has been underestimated (8.4.15)

Traffic using the Service Station

12. When eastbound traffic enters the service station traffic behind it slows, ditto west bound traffic. This would affect traffic both leaving and entering the site and therefore also traffic generally on the A 272. As noted above, it also makes crossing the A 272 hazardous for pedestrians of which there will be an increased number seeking shopping from the service station shop. (see paragraph 5 above)

Traffic using the site access

13. As noted above, traffic surveys were taken by volunteers of the traffic movements at the new developments off London Road, Bolney (Magdalene Rise and Davey Drive). These show that the applicant's figures at para 8.4.4 are underestimated. Truer figures would be at least 40% higher at the morning peak period and at the least 25% higher at the evening peak period. We contend that the morning peak figure would in fact be much higher because of the number of vehicles leaving the proposed development to take

children to school. This is because there is no easy access by foot from the proposed development to Bolney school for the reasons given at para 18 below. It is also noted that according to West Sussex child product a development of 200 houses would typically have 50 children of primary school age. Bolney primary school would not be able to accommodate an additional 50 children which would mean that many of them would have to be transported to other schools further away in any event resulting in further cars being introduced to the roads nearby, particularly the A 272.

Traffic Assessment Methodology (section 8)

14. This section of the applicants' report deals with traffic in the area generally as well as the site access itself, we comment only on the proposals for the site access. (8.1.1). The applicants state that residential trip rates were agreed with WSCC at pre-app stage. (At pre app stage we believe the proposal was for a 100 dwelling development). We do not believe that these figures are representative of a site in Bolney and as noted above volunteers have carried out traffic surveys at the 2 developments on London Road. These have been reduced to a rate per dwelling so that they can be compared to the applicants' figures and are shown below.

Morning Peak (08.00 – 09.00) 0.881 – 0.810 (Applicants 0.454)

Evening Peak (17.00 – 18.00) 0.5 - 0.905 (Applicants 0.442)

The back up to these figures is shown in Appendix 1 to this note of objection. As an aside, it is interesting to note that not one bicycle entered or left these developments during the period of the survey. This shows that cycling is not a mode of transport commonly used by villagers in Bolney.

15. From the experience of those that live in Bolney the private car is still the fundamental means of travel. The generalisations adopted by the applicants in respect of traffic reduction do not seem to be born out by local experience and particularly the traffic levels on the A 272. It is noted that the actual experience of Kangaroo and their forecasts are very much higher (8.4.12) than the overoptimistic assumptions of the applicants expert (8.4.11) by a factor of 6.

Comment on Total Trip Generation (8.4.15)

16. The applicants note that on their figures the flow from the proposed development onto the A 272 is only 2 cars /minute. This is a significant underestimate for the reasons given above. However, even if right this is a significant contribution on a busy and hazardous stretch of road which also serves a very popular service station, the Foxhole Lane/Bolney Chapel Road junction, the industrial estate as well as the 14 houses that directly access onto the A 272. It would make a bad situation much worse. We understand that this section of road has already shown up as a particular hazard on the brake distance study which has been undertaken for West Sussex but is yet unpublished

Accessibility of the Site (Section 5)

17. The Applicant analyses different modes of travel in this section (Walking (5.2.1), Cycling (5.25), Public Transport (5.3). We believe none of these forms of transport provide a solution to overcome the central issue being that Bolney is a small rural village where the residents rely upon the private car for a very high proportion of their needs.

Walking

18. It is accepted that the site can to some extent be connected to the village centre by walking although there are important issues with this. These are examined in detail in Bolney Parish Council's representations to MSDC in respect of the Regulation 19 consultation. First we doubt that those with young children will choose walking as their mode of transport to the village school over private car. This is because once the residents of the proposed development have reached the Street, either by footpath 44Bo or the new pedestrian and cycle access to the north east side of the development they have to negotiate a busy narrow road (the Street) which is either without a separated footpath or with a very narrow one. The Street is surprisingly busy with vehicular traffic. Then, if they are going to the school there are v steep steps through the churchyard up a hill to the school. The first flight of steps requires pushchairs etc to be carried which is difficult to say the least and impossible for many. A step free access to the school is only available by going south back to the A 272 and turning east to an unlit and unsurfaced small steep single track, without a footpath, towards the school. This is a private track and is a public right of way which is not available to cyclists and vehicles do not have a legal right to use it. This route would add a further 250 metres to the journey. The other route by foot from the development to the school is to leave the development by means of the access onto the A272 and turn east where they will have to cross the Street at its junction with the A 272 and then negotiate the private narrow track described above without a footpath to the school (approximately at least 700m from the access point). In summary walking from the proposed development to the school is unsatisfactory for parents with young children and most are likely to choose to travel there by private car. It is contended that the improvements to the Street suggested by the applicants in 6.4 will do little to improve the situation where there is just not enough room for pedestrians with or without prams and pushchairs, let alone disabled persons, and traffic. There would be no designated cycle route from the proposed development to the school.
19. Otherwise there is little available by foot other than the Church, the village hall, the public houses, the nurseries, all as listed in Table 5.3. There is no post office. The Bolney Cross Village Stores and Service Station are only accessible by crossing the A 272 which is a hazardous and fast busy road. The Store is a small store attached to the service station and whilst it supplies some basic necessities it is no substitute for a supermarket or even an "express" type smaller supermarket. Such are available only in Cuckfield (Co-Op), Cowfold, Haywards Heath or Burgess Hill, none of which are within a walking or cyclable distance.
20. Having arrived in the village by foot there is only a very limited bus service (2, (1 service/day to Balcombe and Burgess Hill) and 89 (max 4 services/day to Horsham and Haywards Heath) and 273 (max 7 services/day to Brighton and and Crawley)) and none to Cowfold. This has been reduced recently following a review and is inadequate to

allow travel to and from work at any of the nearby towns or villages. The applicants' plans to enhance this are highly unlikely to provide anything sustainable to improve the situation, there would be too few passengers from a small village like Bolney even with the development to sustain it. The applicants have provided no details of how any such services will be secured to ensure that they are viable, nor details of any financial contributions required to ensure the future operation of these services. The likelihood of new residents finding employment nearby at Marylands (described by the applicants expert as a B8 Employment Site), is remote. Part of the site is used to store vintage and luxury cars and the remainder is, we understand, a data centre.

Cycling

21. As for cycling, the first point to be made is that the A 272 is a fast and dangerous road and unsuitable for cyclists which is patently obvious to anyone who has seen it. The PC knows of no one who cycles along the A 272. This rules out the applicants' contentions on Table 5.3 that any of the services at Cowfold are cyclable, they are not. (Cowfold Surgery, Cowfold C of E Primary School, the barber shop, and the Co-Op).

Active Travel England

22. As regards Active Travel England's Criteria set out at Table 5.9, Access to Public Transport, Bolney has no access to a high frequency Bus Stop and such is unlikely to ever become viable or available. Nor does it have access to a rail/light rail network without using a private car or taxi to get there. The bus services to Haywards Heath and Burgess Hill are infrequent (together a max 5 per day). This development will just throw more cars onto the road network as there is no viable alternative. Further the proposal for the development provides no realistic proposals to enhance local active travel or improvement to public infrastructure, another of Active Travel England's criteria. Both these issues are major stumbling blocks for the Applicants. In summary Bolney has little travel infrastructure and bolting on another 200 houses will just make the situation worse however well those 200 houses are integrated into the village by active travel or otherwise.

Proposed Sustainable Transport Strategy (Section 6)

23. MSDC in its Reg 19 District Plan laid great emphasis on 20 minute neighbourhoods and local living. It says "*A strategic objective of this plan is to create places that encourage a healthy enjoyable lifestyle supporting provision of high quality services and facilities with the opportunity to walk, wheel, cycle or to use public transport to common destinations.*" As noted above, while there are issues with this, the proposed development may be connected to Bolney village by walking, cycling or wheeling that gets the applicants nowhere unless there is usable public transport to "*common destinations*". As demonstrated above there is no such public transport and Bolney villagers generally drive to their common destinations because they have to and the applicants' arguments in this section get them nowhere.

24. Reduction of Commuting Journeys (6.1.2) The applicants contend that the solution is to reduce the frequency of commuting journeys, whether this be by means of home working or otherwise. The traffic surveys of both the Magdalene Rise and Davey Drive/Churchfield View (Appendix 1) demonstrate that people who live in Bolney still use their private cars to commute to their places of work. That is the reality and in face of the applicants' contentions in respect of home working. There may be some home working, of course, but it is contended that still most working people travel somewhere to work most days and in Bolney they do that by car. The applicant's development will increase private car travel to and from Bolney considerably because there is no alternative. Development in areas which are more suitable locations for housing growth in the district where there is access to frequent public transport would avoid this.

Facilitate Sustainable Travel (6.2.6)

25. The applicants state that the proposed development will provide "*tools for, and encouraging the uptake of sustainable modes of travel*". For the above reasons we can see no justifiable evidence for this statement for travel beyond the small village of Bolney.

26. Both the Davey Drive/Churchfield View and Magdalene developments are in lovely locations where unlike the proposed development residents can walk their young children to school. They back on to the cricket field/club, church and school but still most of the residents appear to drive to their places of work. It is contended that the applicants' contention that there is a reduced *need for the residents to travel away from site* is misguided.

12 June 2025