



Statement of Common Ground

Mid Sussex District Council and Highways England

December 2016



1. Introduction

- 1.1 This is a Statement of Common Ground (the 'Statement') between Mid Sussex District Council and Highways England.
- 1.2 Mid Sussex District Council has prepared the Mid Sussex District Plan 2014-2031 which will guide the sustainable development of Mid Sussex to 2031. The District Plan sets out a vision for how Mid Sussex will evolve and a delivery strategy for how it will be achieved.
- 1.3 It is intended that this Statement supports the examination of the District Plan and provides the Inspector with an understanding of the current position of Highways England in respect of the Mid Sussex District Plan.
- 1.4 Mid Sussex District Council has worked closely with Highways England, the highway authority responsible for the strategic road network in Mid Sussex, to ensure that the impact of development proposed by the District Plan on the highway network are known and properly and feasibly mitigated. This has been achieved by work culminating in the production of the Mid Sussex Transport Study.
- 1.5 Production of the Mid Sussex Transport Study has been an iterative process, reflecting the development strategy proposed by the Mid Sussex District Plan. The latest version, the Stage 3 Amended Report, submitted as evidence to support the District Plan at Examination, reports on the transport impacts of the Mid Sussex District Plan, incorporating the Focused Amendments to the Pre-Submission Draft.

2. Mid Sussex District Plan – Consultation Draft

- 2.1 A Consultation Draft version of the District Plan was published for public consultation 21 November 2014 to 16 January 2015.
- 2.2 Highways England responded to that consultation stating they expect Mid Sussex District Council *'to promote strategies, policies and land allocations which will support alternatives to the car and the operation of a safe and reliable transport network; and in order to demonstrate soundness a robust transport evidence base would need to be developed including how key infrastructure requirements can be funded'*.
- 2.3 Suggestions were made to policies DP8: Strategic allocation to the north and northwest of Burgess Hill and DP18: Transport. It was noted that the Sustainability appraisal required updating.
- 2.4 Highways England indicated that they were unable to provide detailed comment until the impact of the known housing allocation required over the Plan period had been tested to analyse the cumulative impacts of all forecast traffic upon the strategic road network (see **Appendix 1**).

3. Mid Sussex District Plan – Pre-Submission Draft

- 3.1 The Mid Sussex Transport Study - Stage 3 was commissioned April 2015 to report on the likely transport impacts of the Pre-Submission District Plan.
- 3.2 On 12 June 2015 Mid Sussex District Council published its Pre-Submission Draft District Plan for a final period of consultation on the Plan's soundness and legal compliance. The public consultation ended on 24 July 2015.
- 3.3 In response, Highways England provided support or support in principle for policies DP1: Sustainable Development in Mid Sussex, DP7: General Principles for Strategic Development at Burgess Hill, DP18 Securing Infrastructure and DP19 Transport (with minor amends) noting that HE will only be able to fully support policies DP7 and DP9 when the Transport Study was completed and available for review (see **Appendix 2**).

4. Mid Sussex District Plan – Schedule of Focused Amendments to the Pre-Submission Draft

- 4.1 Following the publication of the Pre-Submission version of the District Plan in summer 2015, the Council consulted on a Schedule of Focused Amendments to the Plan in November 2015.
- 4.2 Due to the timing in starting work on the Stage 3 Study, it was not possible to examine the transport implications of the later Focused Amendments to the Pre-Submission Draft District Plan, namely an increase in the District Plan housing provision and the inclusion of a strategic development for 600 homes to the east of Pease Pottage.
- 4.3 A Stage 3 Interim Study reporting on the Pre-Submission District Plan was published November 2015 and made available on the Mid Sussex website noting the need for further work.
- 4.4 Highways England responded (see **Appendix 3**) by pointing out that their most recent communication with Mid Sussex District Council consisted of their response to the Mid Sussex District Plan Stage 3 Transport Study and that they had been advised that this study would be revised to include a development scenario of a proposed housing provision of 800 dwellings per year to reflect the Schedule of Focused Amendments.
- 4.5 Highways England advised that, to be content that the District Plan (including the Focused Amendments) was sound, the Study would need to demonstrate that either sufficient capacity existed within the Strategic Road Network to cater for the additional traffic resulting from development or mitigation of the traffic impacts of the new scenario was achievable and deliverable within the development context.
- 4.6 Mid Sussex District Council continued to work with highways England to progress the Study and contribute to the Stage 3 Amended Report. This considers the transport impacts of the Mid Sussex District Plan, incorporating the Focused Amendments to the Pre-Submission Draft.
- 4.7 The final Stage 3 Amended Report was issued on 27th October 2016 following extensive consultations with Highways England and West Sussex County Council.

5. Position of Agreement

- 5.1 Highways England is satisfied that the Mid Sussex Transport Study represents an accurate and fit for purpose study for the testing of the strategic impact of the development strategy proposed by the Pre-Submission Draft District Plan (June 2015) including the focused amendments modifications, on the strategic road network.
- 5.2 Highways England is satisfied that the development strategy proposed by the Pre-Submission Draft District Plan (June 2015) including the focused amendments modifications would not have a severe residual impact on the local road network, subject to the suggested mitigation measures proposed by the Study which are considered feasible to deliver within an appropriate timeframe. Highways England are satisfied that the Plan meets the requirements of the National Planning Policy Framework in respect of the safe and efficient operation of the strategic road network.

6. Other matters

- 6.1 It is agreed that Mid Sussex District Council and Highways England will continue to work actively together and co-operate on matters pertaining to their shared interest and responsibilities.

7. Signatures

Signed:



Name: Christopher Tunnell
Position: Interim Head of Economic Promotion and Planning
Organisation: Mid Sussex District Council
Date:

Signed:



Name: Elizabeth Cleaver
Position: Assistant Spatial Planning Manager
Organisation: Highways England
Date: 2nd December 2016

Appendix 1

Highways England letter dated 16th January 2015 in response to the Consultation Draft District Plan



Safe roads, reliable journeys, informed travellers

Our ref:
Your ref:

Planning Policy Division
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Elizabeth Cleaver
Assistant Asset Manager
Federated House
London Road
Dorking RH4 1SZ

Direct Line: 01306 878605

16 January 2015

Dear Sir / Madam

CONSULTATION ON DRAFT MID SUSSEX DISTRICT PLAN 2014 – 2031 AND DRAFT SUSTAINABILITY APPRAISAL (JANUARY 2015)

Thank you for consulting the Highways Agency in relation to the Mid Sussex District Plan 2014-2031 Consultation Draft District Plan and Draft Sustainability Appraisal. Our most recent communications with Mid Sussex consisted of our response to the Community Infrastructure Levy Draft Charging Schedule Publication which we issued on 19 August 2013 and a response to the Mid Sussex District Plan Proposed Submission document which we issued on 17 June 2013.

The Agency, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient Strategic Road Network (SRN) (i.e. the Trunk Road and Motorway network) in England as laid down in the Department for Transport Circular 02/2013 (The Strategic Road Network and the Delivery of Sustainable Development). I have attached a link to the circular for your convenience.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/237412/df-t-circular-strategic-road.pdf

Overall, in accordance with national policy, we look to Mid Sussex District Council to promote strategies, policies and land allocations which will support alternatives to the car and the operation of a safe and reliable transport network. In terms of the Local Plan documentation we would look to the policies in the draft Local Plan to be consistent with the National Planning Policy Framework (NPPF). Then in order to demonstrate soundness a robust transport evidence base would need to be developed, as well as demonstrating how key infrastructure requirements can be funded.

As per the Council website we understand that while the Plan does include policies which allocate land at Burgess Hill for development the Plan does not include an overall housing number. The website states that the housing number is to be set once all of the technical work on need and capacity has been undertaken and discussions with neighbouring authorities have concluded. With this in mind we are unable to provide

20150116 LT MSDC - Consultation on Draft Mid Sussex District Plan 2014-31.docx

Page 1 of 3



An executive agency of the
Department for Transport

detailed comment until your Council has tested the impact of the known housing allocation required over the Plan period, or at least a worst case scenario has been tested.

In the case of Mid Sussex the Agency's interests relate to the potential impact of development on the M23/A23 corridor from M23 junction 9 to the A23 at Pyecombe. In particular, the impact of future Mid Sussex development traffic upon the following five SRN junctions would be of most concern; M23/A23 junction; A23/A281 Interchange at Pyecombe, A23/A272 junction at Bolney; A23/A2300 and A23/B2118 junctions at Hickstead. We have undertaken a review of the latest information and have the following comments.

Mid Sussex District Plan DP5 Housing

We note that the Council's proposed housing provision figure will be set out in this policy in the pre-submission of the Plan once on-going work on the housing land supply and an assessment of the unmet development needs of neighbouring authorities has been completed.

DP8 Strategic allocation to the north and northwest of Burgess Hill

In our response dated 17th June 2013 on the Mid Sussex District Plan Proposed Submission document we stated that in order to make the policy sound in accordance with NPPF there should be a change of wording, shown in bold, to the following sentence.

"Deliver sustainable transport measures and other infrastructure requirements identified in technical assessments of transport impact, including measures to mitigate impacts upon the local and Strategic Road Network in the Burgess Hill area."

We recommend that the equivalent wording in the November 2014 version of the Local Plan is updated as per above.

DP18 Transport

As per our response dated 17th June 2013 we recommended that, for the policy to be effective and in accordance with the NPPF, the following wording below should be inserted into the policy:

"Provides appropriate mitigation to support new development on the local and Strategic Road Network."

Depending on the amount and location of housing proposed in the latest Local Plan, the evidence base will need to be updated to analyse the cumulative impacts of all forecast traffic upon the SRN for the AM 2031 peak period for the following scenarios: Reference Case; Development Primary and Secondary (P&S) Intervention Case; and Development of Further Remedial Intervention Case.



Ultimately where extra development traffic is likely to load onto busy junctions of the SRN we need to make a judgement as to what scenarios need to be tested. Although exact housing numbers are not yet confirmed, it is clear from previous transport study work that the A23 junction with A2300 experiences congestion during the AM peak. It is also likely to experience a lot of return commuters in the PM peak from proposed development over the plan period, especially from development proposed at Burgess Hill. Therefore we ask that the transport study is also updated to test the operation of the A23 junction with the A2300 dumbbell junctions during the PM peak hour. Once exact housing numbers are confirmed we will be in a position to determine whether we will require additional junctions within the study area to be tested in the PM peak.

For HA to be content that the District Plan is sound, the updated transport study will need to identify which junctions of the SRN require mitigation and we will want to be confident the mitigation can be delivered. Where junction mitigation is required it will be for the Infrastructure Delivery Plan (IDP) to identify indicative costs, funding sources, timescales for delivery of any required mitigation and whether this mitigation is deliverable in terms of buildability (e.g. all within the highway boundary).

Infrastructure Delivery Plan (IDP) Draft, May 2013

The IDP does not appear to have been updated since May 2013. Our comments on this version of the IDP were contained in our letter dated 17th June 2013 and remain the same subject to alterations to the transport study. We appreciate these changes may not be conducted until the Council is clear on the amount and location of housing numbers to be delivered in the Local Plan.

Sustainability Appraisal, Consultation Draft Report, October 2014

Although the transport study will require updating, stage 2 of the study indicates that development near the M23/A23 and A23/A2300 junctions is expected to cause network congestion problems. Therefore paragraphs 3.36 and 3.37 of this appraisal will need updating to reflect the identified congestion issues at these SRN junctions and any additional congestion issues in light of the updated evidence base.

When you are clearer on the quantum and location of housing numbers and are in a position to update the transport study and IDP we would be pleased to meet to discuss the requirements with you further to ensure your Council are able to prepare a robust evidence base ahead of examination.

We look forward to hearing from you.

Yours faithfully



Elizabeth Cleaver
NDD Asset Development Team – Area 4
Email: elizabeth.cleaver@highways.gsi.gov.uk



APPENDIX 2

Highways England letter dated 28th July 2015 in response to the Pre-Submission Draft District Plan



Our ref:
Your ref:

Mid Sussex District Council
Planning Policy
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Peter Phillips
Asset Manager
Bridge House
Walnut Tree Close
GUILDFORD
Surrey
GU1 4LZ

Direct Line: 0300 470 1030

28 July 2015

Dear Sir/Madam,

MID SUSSEX DISTRICT PLAN 2014 – 2031 PRE-SUBMISSION DRAFT & DRAFT SUSTAINABILITY APPRAISAL - CONSULTATION COMMENTS

Thank you for inviting Highways England to provide comments on the drafts of your authority's District Plan and associated Sustainability Appraisal. We have had the opportunity to review them and we have made representations in relation to matters arising in the documents which may have an effect on the operation of the Strategic Road Network (SRN).

We note that the District Plan, when adopted, will replace Mid Sussex Local Plan (2004). The introduction explains that the plan will be used to:

- The Plan sets out a vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved.
- It supports the National Planning Policy Framework's 'presumption in favour of sustainable development'. As such, it sets out broad guidance on the distribution and quality of development in the form of 'higher level' strategic policies.
- It also provides the framework for all subsequent planning documents, including Neighbourhood Plans.
- The District Plan covers the period up to 2031 and will replace the majority of the Mid Sussex Local Plan adopted in 2004.

The comments in this letter reflect guidance contained in:

- Department for Transport (DfT) Circular 02/2013 entitled *The Strategic Road Network and the Delivery of Sustainable Development*, dated 10 September 2013¹;

1

Please note that the DfT Circular will be withdrawn and replaced with a new planning guidance document in the coming months. This document will explain role Highways England will be undertaking and will draw heavily on the existing guidance and internal



- The National Planning Policy Framework (NPPF), published by the Department for Communities & Local Government in March 2012;
- Planning Practice Guidance (PPG), published on 6 March 2014 and updated selectively thereafter;
- The Highways Agency and the Local Plan process: A Protocol for Local Authorities, Developers and the Highways Agency, revised June 2014; and
- Spatial Planning Advice Note: SP 09/09 Local Plans – Evaluating Transport Impacts.

Our response is largely structured in line with the questions set out in the consultation response pro-forma. Where necessary, additional sections have been included relating to evidence base and other matters not covered by the questions.

Evidence Base – Stage 3 of the Mid Sussex Transport Study

The importance of a quality evidence base to ensure a sound District Plan is emphasised in NPPF, the DfT Circular and Highways England's *Protocol* documents. It is important to understand the transport implications of the proposed allocations and in particular, Highways England will require assurance that the scale and pattern of development proposed in the plan will not compromise the operation of the SRN.

The District Plan text makes reference to the preparation of a Transport Study and Nathan Spilsted (Senior Planning Officer) has advised that the study will not be available for review in conjunction with the proposed District Plan. We had a meeting about preliminary transport study findings in June and have made recommendations about how the study should be taken forward to examine A23 and M23 impacts.

Highways England expects the Transport Study to adopt a robust approach to the assessment of the individual and cumulative impacts of the development proposals identified by the District plan and in the emerging plans of neighbouring authorities. As such your engagement with adjacent local authorities is welcomed.

Highways England will welcome early sight of the completed Transport Study and supporting evidence in order that these can be reviewed and that any issues identified. This can help to avoid any potential conflicts or surprises which might arise at later stages in the process.

Identifying and Assessing Need for Highway Infrastructure

In relation to the potential on the SRN for capacity enhancements and infrastructure required to deliver strategic growth, Paragraph 33 of the DfT Circular 02/2013 explains that need for such schemes should be identified at the local plan stage (rather than at the subsequent planning application submission stage). Paragraphs 37 to 44 set out the policy to be adopted in relation to new accesses to the SRN. In summary this seeks, subject to certain tests, to restrict the formation of new accesses onto the high speed

protocols. In the meantime, a *Transition Statement* has been prepared (<https://www.gov.uk/government/collections/planning-and-economic-development>) to provide information on the key changes.

SRN in order that the safe and effective movement of goods and people is not compromised.

Paragraph 18 of DfT 02/2013 explains that Highways England will work collaboratively with your authority and strategic delivery bodies to identify whether infrastructure schemes are suitable, viable and deliverable and how they could potentially be funded.

Priority Themes

The priority themes for 2031 are welcomed insofar as they relate to transportation. The 'Protecting and enhancing the environment' theme seeks to *"ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks"*. The 'Promoting economic vitality' theme seeks *"To provide opportunities for people to live and work within their communities, reducing the need for commuting."* The 'Supporting healthy lifestyles' priority theme seeks *"To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations."*

It is considered that the approach is compatible with Section 4 of the NPPF (*Promoting sustainable transport*) and paragraphs 16-17 of the DfT Circular 02/2013 (*Promoting sustainable transport solutions through Local Plans*). Highways England is keen to see that the production of Local Plans supports development whose location and type allows:

- Uptake of sustainable transport modes;
- The support of wider social and health objectives;
- The support of existing business sectors; and
- Economic growth.

On that basis Highways England supports the preferred approach, and the priority themes and the strategic objectives for the District Plan as they relate to transportation.

The District Plan Policies

Policy DP1 – Sustainable Development in Mid Sussex

Highways England notes that, in summary, the policy to support sustainable development in Mid Sussex intends that:

"When considering planning applications, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (paragraphs 14 and 15)."

- Social: improves the quality of life, wellbeing and the conditions in which people travel whilst increasing opportunities for people to walk, cycle or use public transport;



- **Economic:** supports the local economy whilst minimising the need to travel to other areas for employment in addition to providing opportunities to access employment closer to home;
- **Environmental:** maximises the use of previously developed land and buildings within the built-up areas and reduces the environmental impacts of development.

Highways England gives support in principle to this policy, with its emphasis on sustainable development and improving travel choice as it accords with NPPF and hence DfT 02/2013 policy.

Policy DP7: General Principles for Strategic Development at Burgess Hill and DP9: Strategic Allocation to the north and north-west of Burgess Hill

The settlement hierarchy is focussed on Burgess Hill being the primary location for housing provision within the District. A strategic mixed-use development, is proposed to be allocated to the north and north-west of Burgess Hill for:

- Approximately 3,500 additional homes and new neighbourhood centre areas, including retail, education, health, employment, leisure and community uses;
- 30 hectares of land for a high quality business park;
- Two new primary schools and a new secondary school campus; and
- A Centre for Community Sport in the vicinity of the Triangle Leisure Centre and St Paul's Catholic College.

Strategic development within Burgess Hill will have the following implications for transport within Burgess Hill and the surrounding areas:

- Improved public transport, walking and cycling infrastructure and access to Burgess Hill and Wivelsfield railway stations, including the provision of transport interchanges;
- Provide necessary transport improvements that take account of the wider impact of the development on the surrounding area;
- Provide highway improvements in and around Burgess Hill including addressing the limitations of the A2300 link road and its junction with the A23 and east-west traffic movements across Burgess Hill and, where necessary, improvements across the highway authority boundary in East Sussex; and
- Support the delivery of a multi-functional route between Burgess Hill and Haywards Heath.

Highways England gives support in principle to these policies to ensure that the A23/ A2300 junction and considers it generally compatible with the DfT Circular. However due to the quantum of development proposed at Burgess Hill, we would suggest that the infrastructure requirements should not be considered an exhaustive list and that each large planning application will need to assess its impact on the SRN, this may include junctions such as the A23/ A272 at Bolney and the A23/M23. It is noted that we have been advised that the updated Transport Study to support the requirements for the named aspects of infrastructure is not yet completed or available. Highways England will only be able to fully support policies DP7 and DP9 when the Transport Study is completed and available for review.



Policy DP18: Securing Infrastructure

With respect to the funding of infrastructure, we note that the Council is currently examining how the Community Infrastructure Levy (CIL) schedule consultation will be available from August 2015 and that this is the proposed mechanism for securing contributions to delivering infrastructure to support development on strategic development sites.

In response to the above, Highways England supports this policy in principle and would request input into any mechanism for funding infrastructure, in particular the future Community Infrastructure Levy (CIL) consultation. It will be necessary to demonstrate how the key schemes relating to the SRN will be funded and delivered. We would recommend that all potential funding sources are listed along with an estimate of the likelihood of acquiring funds from each source to demonstrate the funding viability and deliverability of infrastructure requirements.

You will be aware that PPG states that infrastructure proposals on the SRN are not considered suitable for funding through receipts from CIL due to their scale and nature². Similarly, PPG explains that the restrictions placed by CIL Regulations on the use of legal agreements made under the Highways Act 1980 do not apply to the Highways Agency or its successor bodies.

Policy DP19: Transport

Highways England supports the preferred approach to development management detailed in Policy DP19. The policy is compatible with policy contained in the DfT Circular that development management measures should be employed which support sustainable transport choice and retain capacity within the transport network. Highways England offers some modest suggested amendments to the policy text and these are outlined below.

The third criteria for the permission of development to be granted refers to the severe cumulative impact of development in terms of road safety and increased traffic congestion, is important and welcomed.

Highways England considers that Neighbourhood Plans will need to include clear and compelling justification for the inclusion of parking standards (as a method of managing the local road network) in their Neighbourhood Plans, as this is a requirement set by a ministerial statement in March 2015³.

The policy states that development proposals should be supported, where appropriate, with a Transport Assessment and Travel Plan that is effective and deliverable. The policy should note that such documents should set out how transport infrastructure arising from the expected demand may be funded and delivered.

Highways England welcomes the inclusion of the seventh criteria which requires development to mitigate impacts on the local or strategic road networks. We suggest

² PPG Reference ID: 25-107-20140812

³ <https://www.gov.uk/government/speeches/planning-update-march-2015>



the inclusion of a reference to transport improvements being secured by legal agreements would be considered helpful.

Additional points

The term '*highway authority*' is used in the glossary. It may be helpful to elaborate on this and explain that West Sussex County Council is the local highway authority and Highways England is the highway authority for trunk roads and motorways (the SRN).

Sustainability Appraisal Pre-Submission Report June 2015

Paragraph 3.36 notes that Stage 2 of the Mid Sussex Transport Study demonstrated that planned strategic development would cause congestion issues on SRN junctions including the A23/A2300 Hickstead Interchange and the M23/A23 junction.

We support Sustainability Objective 11: To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.

Concluding remarks

We are content that the general principles are acceptable; however you will appreciate that any further detailed comments cannot be made until the Transport Study Stage 3 is made available. We look forward to working in partnership to understand the implications of this piece of work when it is complete.

Therefore we shall reserve our assessment on the soundness of the plan until such time that the Transport Study is available.

I trust that in the meantime the information set out in this letter assists you in your plan preparation. If you have any queries, please do not hesitate to contact me.

Yours sincerely



pp
Peter Phillips, Asset Manager
NDD Asset Development Team - Area 4
Email: peter.phillips@highwaysengland.co.uk

cc Zoe Johnson, WSP | Parsons Brinckerhoff
Nigel Walkden, WSP | Parsons Brinckerhoff

APPENDIX 3

Email from David Bowie sent on 15th January 2016 in response to Mid Sussex District Plan Focused Amendments consultation

Dear Sir,

Thank you for your letter dated 19th of November, consulting Highways England in relation to the Mid Sussex District Plan Focused Amendments.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will therefore be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).

Our most recent communication with Mid Sussex District Council consisted of our response to the Mid Sussex District Plan Stage 3 Transport Study. We have been advised that this study will be revised to include development scenario at a plan provision of 800dpa which is to reflect the focused amendments. Therefore, for Highways England to be content that the district plan (including the focused amendments) is sound, this study will need to demonstrate that either sufficient capacity exists within the SRN to cater for the additional traffic resulting from development or mitigation of the traffic impacts of the new scenario is achievable and deliverable within the development context.

It should be noted that we are currently reviewing the Pease Pottage applications DM/15/4711 and DM/15/4706. These applications cover the strategic site included in DP9A. We have raised concerns regarding these applications and are currently discussing these matters with yourselves, West Sussex County Council (WSCC) and the applicant. Unfortunately this site has been brought forward by the applicant ahead of any investigatory work and agreement between Highways England, Mid Sussex District Council and WSCC. At this point neither of us are certain whether or not this site is deliverable bearing in mind the extent of Highway and Transport mitigations that may be necessary. Despite this we are not, at this point, opposed the inclusion of the site within the District Plan provided that the Transport Study can demonstrate that sufficient mitigation can be delivered for this strategic site.

We do not have any further observations and await the completion of the revised Stage 3 Transport Study for consideration and comment in due course.

Regards

David