

MID SUSSEX DRAFT DISTRICT PLAN 2021-2039: Matter 5.
CPRE Sussex pre-examination submission re spatial distribution strategy

1. This submission by CPRE Sussex responds to the Inspector's call for Matter 5 discussion on the effectiveness and soundness of the proposed distribution of new development. We focus mainly on the question asked as to *"Whether the spatial strategy takes an appropriate approach, at the strategic level, towards climate change mitigation, countryside protection, environmental protection, flood risk and heritage"*.
2. CPRESx's regulation 19 representations and statements prepared for the October 2024 draft Plan examination, addressed this issue in detail, and are essential to our argument. In them CPRE Sussex challenged the soundness of the draft District Plan's spatial strategy. Whilst we recognise the need for some modest sized greenfield allocations, we do not accept that it is appropriate for 94% of new allocated homes to be on greenfield sites (the only urban/brownfield sites are DPH3 and DPH8); nor for so much of that greenfield development to be focussed on car-dependent strategic sites around Sayers Common that are all remote from the services and facilities on which they will be dependent and based on the undeliverable myth that they can be self-sustaining 20 minute communities.
3. It is CPRESX's case that the only effective and justified strategy is one that concentrates more development within and around existing larger settlements and (where available) brownfield sites (Sustainability Appraisal options 4 and 5), supports organic growth in other settled communities, and avoids large isolated rural sites. It is a strategy that is consistent with the conclusions of the Sustainability Appraisal. There is scant evidence in support of the Council's claim that these preferable options, in combination, are not a viable strategy. It is a key shortcoming of the draft Plan that the potential for densification of the main town centres has been inadequately explored. Density considerations and density standards – required by NPPF para 129 - are not even addressed within the Plan spatial strategy policies.
4. We respectfully ask the Inspector to re-read and have regard to our submissions to the Plan's October 2024 examination hearings, copies of which we annex to this note. These submissions are all directly pertinent to the subject matter covered by Matter 5 of the forthcoming examination hearings. These previous representations addressed specific questions raised by the previous Inspector as follows:

Annex	Examination Library Ref	Inspector question addressed in CPRESX's representation
1	42888161-002	Whether the Spatial Strategy is justified, positively prepared, effective, and consistent with national policy?
2	42888161-004	Is the Council's approach to calculating its full, objectively assessed needs and housing requirement justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy? Are there exceptional circumstances to suggest that an alternative approach be taken.
3	42888161-003	Would the site allocations become genuinely sustainable, or given their locations, would they remain heavily reliant on the private car? For example, I note that the cycle routes within the identified Sustainable Communities sites would only lead to a reduction in highway traffic of 1-2%?

11th February 2026

Annex 1

Memorandum from CPRE Sussex (Representee No: 1189028) re Matter 3, Issue 2 (Spatial strategy soundness) at Stage 1 of the public examination of Mid Sussex DC's District Plan 2021 - 2039.

30 September 2024

Matter 3: Vision, Objectives and Spatial Strategy.

Issue 2: Whether the Spatial Strategy is justified, positively prepared, effective, and consistent with national policy?

1. In its Regulation 19 representations, CPRE Sussex challenged the soundness of the draft District Plan's spatial strategy, in particular its unjustified over-reliance on the allocation of large rural sites for housing rather than focussing more development in and around the District's existing larger towns which is what NPPF para 125 calls for. The Council's spatial strategy fails to promote the most effective use of the District's land, which is a cornerstone NPPF policy expectation – see NPPF para 119 (September 2023 version).
2. Density considerations and density standards required by para 125 are not addressed in the draft Plan. The opportunities for greater in-town and around-town housing growth rather than allocating 7 significant rural sites are inadequately explored.
3. The Plan's spatial strategy is not supported by the SA. Even without allowing for the distortions resulting from its flawed methodology, the SA's summary table 1 graph (p.60) that compares the SA's fourteen sustainability objectives as between the five appraised options, demonstrates that option 3 (Creating a new sustainable settlement with associated facilities) is easily the least sustainable of the five, and that option 4 (Focus development in the three towns utilising existing facilities and transport links) and option 5 (Prioritise development on brownfield land) are considerably more sustainable overall.
4. The Plan's heavy reliance on rural locations does not make efficient use of the district's limited unconstrained land or existing town-centre oriented infrastructure. It does not even pay lip service to the desirability of maintaining the Low Weald's prevailing character and setting around Sayers Common. As such it is incompatible with NPPF para 124.
5. Rural development necessarily involves relatively low density development, it involves very inefficient use of land for significant developments, the need to create from scratch new infrastructure and connectivities which would otherwise be available in existing communities.
6. An alternative special strategy of concentrating more development within and around existing larger settlements and brownfield sites (SA options 4 and 5), and avoiding large isolated rural sites, is the only effective and justified strategy that is consistent with the conclusions of the SA. There is scant evidence in support of the Council's claim that these preferable options, in combination, are not a viable strategy.
7. Take as an example the Martlets Centre in the centre of Burgess Hill. It is not even mentioned in the District Plan despite it being the largest brownfield site in the district, and a key part of Burgess Hill's town centre, an area that is in real, real need of regeneration, where the development of a carefully thought-out 20 minute community could provide a substantial planning solution. What is MSDC's justification for limiting its ambitions for the housing component of the redevelopment of this key location to 172 privately rented flats without a single affordable home or even a £'s worth of infrastructure contribution? Where is the ambition? Where is the imagination? Where is the policy? There is not even a density standard against which to judge it.

8. We have been particularly concerned about the proposed allocation of the 5 sites at Sayers Common (DPSC3 -DPSC7) which are key allocations in terms of the Plan's spatial strategy.
9. The Plan's assumption that the 5 individual Sayers Common allocations (all in different ownerships) can be welded together into a sustainable 20 minute neighbourhood community, and the Plan's heavy reliance for its spatial strategy objectives on this being achieved, is totally unrealistic for evidence-supported reasons explained in detail in our Regulation 19 representations. No successful self-sustaining 20 minute neighbourhood has ever been established in a rural location anywhere to the best of our knowledge. The most authoritative UK study of 20 minute neighbourhoods, undertaken by the Town & Country Planning Association (<https://www.tcpa.org.uk/collection/the-20-minute-neighbourhood/>) offers no support for the concept in a rural context. MSDC has no developed masterplan as to how they would achieve their ambition, and have made no attempt to engage the local community in their proposed project. The Council's unrealistic challenge is made all the greater by the fact that the 5 sites involved do not form a coherent whole and are in different ownerships. These allocations do not support or further Plan objectives 2, 9, 10 or 12.
10. The representations made National Highways (Respondent Ref: 1191183) as to both the increased traffic flow impacts on the A23, and potentially key junctions onto the A23, and the ineffectiveness of sustainable transport mitigation proposals involving these allocations add further weight to our own concerns, and contradict from an authoritative source the SA's claim vis a vis these allocations that "*It is therefore considered that this [i.e. minor wording changes to the policy since Reg 18] would have a minor positive impact on climate change and transport*" (SA p.B-75).
11. CPRE Sussex considers the proposed allocation of the sites DPSC3 – DPSC7 at Sayers Common, which the Council claims would create a sustainable 20 minute neighbourhood, is unsound. The Council has produced no robust evidence as to how they will achieve this objective, an objective fundamental to its new housing strategy. Allocation policies DPSC3 – DPSC7 in particular are neither consistent with the NPPF nor justified by the evidence in the SA or other robust evidence; and, on multiple other grounds, represent unsustainable, undeliverable, unjustifiable policy proposals pursuant to a flawed special strategy that is over-reliant on the allocation of large rural sites whilst giving no weight to environmental and infrastructure constraints.

Annex 2

Memorandum from CPRE Sussex (Representee No: 1189028) re question 59 raised by the Inspector for Stage 1 of the public examination of Mid Sussex DC's District Plan 2021 - 2039.

Matter 6: Housing: Issue 1: Whether the Council's approach to calculating its full, objectively assessed needs and housing requirement is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

- Q. 59. *Are there exceptional circumstances to suggest that an alternative approach be taken? If so, what are they, and how would they impact on housing need? Is the Strategic Housing Market Assessment 2021 (H1) up to date and justified?*
1. CPRE Sussex requests the Inspector to consider the extent to which environmental and infrastructure constraints limit the number of new homes that the Plan can cater for within its housing policy.
 2. CPRE Sussex does not pretend to sufficient expertise to comment in any detail on the soundness of the Council's Infrastructure Delivery Plan or its achievability in practice. We are aware of significant water supply and sewerage capacity constraints that require addressing in order to make the new Plan deliverable. However, we don't seek to make any representations as to the degree to which the need for, and timely deliverability of, necessary new infrastructure provision may constrain new housing provision during the life of the new Plan. We are confident that the Inspector will be conscious of any such issues, including as a result of representations from statutory consultees and others who are better informed.
 3. As to environmental constraints, the starting point is the Plan's core recognition is that Mid Sussex is and should remain a rural district of high landscape and ecological value. Amongst other implications of this fact are the real economic benefits the District derives from its attractiveness as a visitor attraction and its contribution to agricultural productivity, climate change regulation and so on.
 4. We draw the Inspector's attention to the Capacity of Mid Sussex District to Accommodate Development Study commissioned by the Council as part of the evidence base for its current District Plan. [The document is reference EP47 in the 2018-2031 District Plan Evidence Library]. Although the Council has not updated that Capacity Study, by their nature environmental designations etc do not often significantly alter, and we consider that the Capacity Study still provides relevant and important evidence that needs to be taken into account, subject to the qualification that the urban area of the District will have grown measurably, and the undeveloped area equally contracted, since the Capacity Study was conducted.
 5. The Study concludes that there are very significant environmental constraints to development:

“Environmental constraints to development

- 6.8. *Figure 4.1 shows the environmental and infrastructure related primary and secondary constraints identified in the District in Sections 2 and 3, and highlights how constrained Mid Sussex is. There are only very small pockets of the District that are not already developed and have no significant environmental or infrastructure constraints, and even some of these may still be constrained (e.g. Grade 3 agricultural land has not been included in the primary and secondary constraints, nor has landscape with medium capacity for development)¹.*

6.9. However, not all constraints to development have equal weight. As discussed in Section 4, primary constraints have been identified where it is unlikely that there would be capacity for any significant development, because of both their high environmental sensitivity and the strong policy safeguards that apply to them. Primary constraints cover approximately 63% of the District, as shown in Figure 4.2. These largely comprise the nationally designated landscapes of the High Weald AONB and the South Downs National Park², as well as smaller areas in the District covered by national nature conservation and heritage designations, public rights of way, areas of highest flood risk (zone 3) and high agricultural land quality (Grades 1 and 2, although there is no Grade 1 agricultural land in the District).

6.10. Outside the primary constraints, a further 29% of the District is covered by at least one secondary constraint. This means that, including the urban areas, 92% of the District is covered by one form of 'mappable' constraint or another. After urban areas (which cover 4%) are removed this leaves only 4% of the District without a primary or secondary constraint.

6.11. The secondary constraints mostly comprise the 7km buffer zone around Ashdown Forest SPA, which extends into the north east of Mid Sussex, the 1km buffer zones around the edges of the AONB and National Park, ancient woodland sites including a 15m buffer, open space, sports and recreation areas and areas assessed as having "Low" and "Low/Medium" landscape capacity to accommodate development (i.e. very sensitive landscapes where development would have a significant impact on landscape character). Although these secondary constraints do not necessarily represent areas that cannot be developed, some are afforded protection under national policy, and often they represent areas where significant environmental impacts could occur, and where mitigation measures are likely to be required to avoid or reduce the significance of the impacts.

6.12. In the parts of the District not covered by primary constraints, development could be more challenging where there is more than one secondary constraint due to the added costs and challenges that would be required to adequately mitigate the potentially significant impacts on the environment in those areas (depending upon the nature of the constraint concerned). Figure 4.3 highlights those areas in the District where there are more than one secondary constraint. However, as shown in Table 4.2, there are only very small areas outside of the primary constraints that are covered by between three and six secondary constraints:

- 63.6% of the District is covered by primary constraints.
- 63.9% of the District is covered by primary constraints with at least four secondary constraints outside the primary constraints area.
- 66.6% of the District is covered by primary constraints with at least three secondary constraints outside the primary constraints area.
- 77.2% of the District is covered by primary constraints with at least two secondary constraints outside the primary constraints area.
- 92% of the District is covered by primary constraints plus at least one secondary

1 20ha of the land included within the proposed Sayers Common allocations is apparently Grade 3a quality agricultural land.

2 That part of the South Downs National Park which falls within Mid Sussex district is outside the proposed Plan area. However its setting extends into the southern part of the Plan area.

constraint outside the primary constraints area. The main reason for this step-change is the extent of the landscape of the District outside of the primary constraints that has been assessed as having low or low/medium capacity to accommodate development.

- *Built-up areas account for 4% of the District, leaving only 4% that is not covered by a primary or secondary constraint."*
6. Plan policies already recognise that new development has to be significantly limited within or adjacent to the High Weald AONB, which occupies over 50% of the Plan area, within the setting of the South Downs National Park and within the Ashdown Forest 7km zone. Proposed policies DPC1 – DPC3 also create sensible, but more limited, constraints on new development in the countryside. Those proposed policies do allow for small scale development in the countryside in some circumstances. Other proposed plan policies create further limited constraints in specific circumstances (e.g. in conservation areas, to maintain the availability of best quality agricultural land, or to safeguard airport or mineral exploration operations).
 7. In the bigger picture, though, the effect of the primary National Landscape and Habitats Regulations constraints is to skew the majority of the District's new development towards the rural Low Weald, the opportunities for further sustainable housing growth in the northern half of the District outside the main urban areas there having been largely exhausted. The spatial strategy proposed by the Council in its draft Plan demonstrates that, with 6 of the 7 strategic sites and some other allocations being proposed there.
 8. As explained in respect of earlier matters addressed during these stage 1 hearings, there is a vacuum of land use policy within the Plan as regards the Low Weald and its rurality that contributes so importantly to the character of the District.
 9. To open up the rural Low Weald in Mid Sussex to major levels of new development without a policy-based strategy that takes full account of robust evidence of the area's capacity to absorb it, and of the need for a proper balance between development and environmental objectives would be the opposite of positive planning and wholly unjustified. There is no current evidence outside the Capacity Study and Natural England's Low Weald Landscape Character Area Study³ as to the area's capacity to absorb new development, and that evidence is that capacity is significantly constrained both in the Low Weald and elsewhere within the District.
 10. The NPPF's core purpose of delivering sustainable growth (NPPF paras 7-9) demands the balancing of environmental impacts against economic and social ones in order to achieve positive planning. The existence of significant environmental constraints throughout the District is real and evidenced.
 11. However, the degree of the potential for sustainable development expansion in the rural south of the District in the face of these environmental (and infrastructure) constraints, and its likely impact on the small rural villages there is significantly under-evidenced. The sustainability balancing act required by the NPPF cannot be justifiably assessed without this evidence and an approved land use policy that takes it into account. Nor can the appropriateness of significant allocations in that part of the District.
 12. In considering the soundness of the Council's housing target policy and the pressure from neighbouring authorities for Mid Sussex to absorb some of their shortfall, both the environmental capacity, and timely deliverability of new infrastructure requirement capacity, of the District to do so are highly material considerations.

3 <https://publications.naturalengland.org.uk/publication/12332031>.

13. We acknowledge that the Council has felt obliged to adopt the current standard-method-imposed OAN as the starting point for setting its housing target. The methodology from which that methodology is derived has been widely criticised (not least by CPRE) as producing arbitrary results that operate in districts like Mid Sussex to require levels of housing that exceed by a considerable margin the actual locally assessed housing needs of the district. In 2022 the Council calculated that excess at 5,628 dwellings⁴. CPRE Sussex estimates that excess to be greater than that.
14. The new housing target that the Council is proposing, which is so well above the Council's assessment of the District's actual local need, and exceeds the OAN by which this Plan's soundness is to be judged, demonstrates a preparedness to shoulder a considerable contribution towards meeting national aspirations to increase the overall national housing stock despite the evidenced constraints that its rurality imposes and the loss of the economic and social, as well as environmental, benefits that that this rurality offers to the District and the communities living here. Nor is there any robust evidence before the Inspector that the building of more homes will reduce property prices and make home-buying or renting in Mid Sussex more affordable.
15. In proposing the housing target that it has in policy DPH1, the Council claims that there are no exceptional circumstances to justify an alternative approach. CPRE Sussex disagrees. In our view the Council has given no weight to the evidence of its own comprehensive 2014 Capacity Study (which it has not found it necessary to update) and has failed to undertake any detailed ecological impact study either via the Sustainability Appraisal or separately. Neither a sound spatial strategy nor a sound housing target is possible without taking full account of robust capacity evidence (which is available in the Capacity Study, but has not been used) and of robust ecological evidence (which has not been provided by the Council). In our opinion the capacity evidence constrains both policies rendering those draft policies in the present form unjustified.
16. There is ample precedent demonstrating how environmental and other constraints have led to the acceptance by the Planning Inspectorate of the soundness of local plans with housing targets that do not exceed, or fall below its Plan area's OAN. The Inspector's report following the examination of Surrey's Mole Valley DC's Local Plan provides the most recent example of the application of that constraint in practice⁵. Whilst each plan must of course be reported on according to its individual merits, it is significant that the Inspector of that Plan concluded that:
- "104. Taken together, roughly 80% of the District is covered by designations which provide a strong reason for restricting the overall scale, type and distribution of development as per the presumption in favour of sustainable development in NPPF paragraph 11. A higher housing requirement would be likely to conflict with the purposes of those designations, which act to restrict development.*
- 157. To conclude, the Plan sets out a spatial strategy for the delivery of housing which is justified and consistent with national policy. The total housing requirement in the Plan is*

4 Extract from a letter from the then Council Leader to the Secretary of State for Levelling Up, Housing & Communities dated 16 February 2022: *"Household projections are simply not an accurate reflection of local 'need.' The Standard method uses out of date household projections despite more recent projections being available. This makes a significant difference for Mid Sussex and would reduce our need from 18,587 to 12,959. It is highly probable that at the higher figure, Mid Sussex can not achieve a reviewed Plan with community support, but at the lower figure I am confident we could."*

5 <https://www.molevalley.gov.uk/planning-building/mole-valley-local-plan-2020-2039/>

soundly based, and subject to the above MMs is robustly expressed with sufficient information on delivery.

158. Subject to MMs in relation to the housing requirement and trajectory, the evidence shows a shortfall against LHN of 2,359 new dwellings over the Plan period. The Plan would meet 73% of LHN, with a 27% shortfall.

159. However, the Council has undertaken a thorough examination of sites based on robust evidence to deliver an appropriate strategy for allocated development sites. I have found that the Plan's site selection methodology accords with national guidance and policy in striving to meet LHN for the District, whilst having regard to the full range of policies contained within the NPPF, for example regarding AONB and Green Belt. The nature of the District, with its considerable and extensive environmental constraints, significantly reduces the options for meeting development needs. The Council has, however considered reasonable alternatives at every step of the site selection process.

160. Whilst the Plan would not meet housing need, its supply led housing requirement would represent a significant but realistic boost to housing supply from the requirement of the existing Plan."

466. Overall, I conclude therefore that, subject to the MM recommended, the Plan's approach to viability and monitoring has been positively prepared, is justified, effective and consistent with national policy."

In reaching this conclusion the Inspector accepted that there had been co-operation with neighbouring authorities in the same housing market area, all of whom were in a similar position of being unable to meet their own OAN-imposed housing targets and therefore unable to contribute to meeting Mole Valley's own shortfall. He did however require Mole Valley to release an area of green belt for housing allocations (the result of which is taken into account in the figures quoted in the above para 158 of his report.

17. For the reasons explained in our evidence to these hearings (including our Regulation 19 representations), CPRE Sussex does not consider that the draft District Plan's housing target is consistent with the core sustainability objectives of the NPPF, and that there is insufficient evidence to demonstrate the sustainable deliverability of that target having regard to the natural and infrastructure constraints to which the District is subject. Indeed, without a change in the Plan's spatial strategy to focus new development in and around urban towns and away from unsustainable rural greenfield sites (on which issue we have provided a separate statement), we say that the housing target currently proposed in the draft Plan is undeliverable, making the Plan unsound as it stands.

Annex 3

Memorandum from CPRE Sussex (Representee No: 1189028) re question 48 (Sustainable Transport effectiveness) raised by the Inspector for Stage 1 of the public examination of Mid Sussex DC's District Plan 2021 - 2039.

30 September 2024

Matter 4: Transport: Issue 1: Whether the Plan is justified, effective and consistent with national policy in relation to transport

Q.48. *What mechanisms would be required to achieve the proposed improvements set out within the individual allocations and would they be enough to prevent the transport impacts identified? Would the delivery of the sites be viable so as to be able to support the required mitigation requirements over the long term? Is the cost of any mitigation requirements reflected in the VA. Moreover, would these sites become genuinely sustainable, or given their locations, would they remain heavily reliant on the private car? For example, I note that the cycle routes within the identified Sustainable Communities sites would only lead to a reduction in highway traffic of 1-2%?*

1. CPRE Sussex is concerned to ensure that a realistic view is taken of the very limited likely effectiveness of any proposed sustainable transport measures when assessing the sustainability of significant new site allocations, especially those that would be rurally located with their central hub being more than a mile from the more than the key infrastructure (supermarket, main line railway station, health, sports and culture facilities etc) on which their residents will depend.
2. As we made clear in our Regulation 19 representations, CPRE Sussex is particularly concerned at the implications for the proposed Sayers Common allocation sites DPSC3 – DPSC7. The Council's claim that these allocations constitute urban extensions of Burgess Hill and, as a result can be turned into 20 minute self-sustaining neighbourhood communities is unjustified¹. They are all rural sites on the opposite side of the A23 from Burgess Hill up to 7 km away from the centre of Burgess Hill. They will all depend on access to Burgess Hill or other urban locations for most of the facilities on which their residents will depend. Most residents' work opportunities will also be remote from their homes.
3. No part of the sites is in walking distance of Burgess Hill. The Town & Country Planning Association's "20 Minute Neighbourhoods" study² (March 2021) reports that "*Studies have shown that most people will choose to walk only if their destination is less than a mile away, with 800 metres being a typical catchment area. Data from the 2019 National Travel Survey shows that around 80% of trips of under a mile were undertaken on foot.*" (p18) Nothing in the TCPA study supports the premise that successful 20 Minute Neighbourhoods can be created otherwise than in a densely populated urban environment.
4. The Mid Sussex Local Cycling & Walking Infrastructure Plan (MSDC Doc T12) does not include any plan to ensure the connectivity of the Sayers Common allocation sites with Burgess Hill. That plan concludes that cycling over 5km is unlikely to be an attractive option – which may well explain why there appears to be no plan to deliver walking or cycling connectivity to

¹ If it were true that these sites represent an urban extension of Burgess Hill their allocation would involve the coalescence of Burgess Hill with Sayers Common and Albourne, contrary to proposed Plan policy DPC2 and current Plan policy DP13.

² https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

and from Burgess Hill. No evidence is even available to demonstrate that safe, lit and accessible cycle routes would be available to connect the new community with the facilities they would require in Burgess Hill. Nor even as to the journey lengths, which is particularly relevant given the Plan's finding that the sustainability effectiveness of cycle routes exceeding 5 km would be very limited. Neither funding for their construction, nor likely user take up, can be measured in the absence of this evidence.

5. Most people will only use public buses as an alternative to cars if the service runs at least every 20 minutes (including in the evening and at weekends). There has to be sufficient demand to make this commercially viable in the medium and long term. The population of the proposed significant sites will not be sufficient to assure that viability.
6. There is no evidence that car sharing schemes have more than a minimal impact.
7. Wherever new development is located close to a regular road network sustainable alternative travel options (which are particularly key to the effective delivery of 20 minute neighbourhoods) are going to succumb to the lure of the car, and the convenience and flexibility that it offers. Common sense, allied to all the available evidence indicates that the positive impact of sustainable transport options, however laudable in principle, is minimal; and does not make an otherwise unsustainable development location sustainable.
8. That is true of Sayers Common, where it is admitted in MSDC's Travel Study that cycle routes within the identified sites would only lead to a reduction in highway traffic of 1-2%. It is equally true of other larger housing site proposals as well as the rightly unallocated Cucksty site at Ansty where even the promoter's own optimistic travel plan anticipates a mere 5% reduction in single occupancy car travel after 5 years.
9. We note the conclusion of National Highways that the Council's sustainable transport strategy is unsound: In relation to policy DPT1 their regulation 19 representation para 28 says: "*Existing Transport Assessment, Transport Statement and Travel Plan are robust but unlikely to be sufficient in the context of achieving net zero, reduced emissions, and 20-minute neighbourhoods nor for the cumulative impacts of developments with hundreds of new homes.*"
10. The promotion of sustainable transport measures is of course to be encouraged, and is an expectation of the NPPF. However, sustainable transport mitigation measures supporting allocations are likely to be ineffective to deliver material modal shift away from cars. Sustainable transport proposals will therefore rarely, if ever, by themselves render an otherwise unsustainable rural site allocation sustainable in the absence of exceptional circumstances.
11. This conclusion is supported by the evidence from a 2020 Transport for New Homes/CPRE joint report called "Garden Villages and Garden Towns: Visions v Reality"³. This report studied the actual impact of 20 new permitted village developments and concluded that all of them have ended up as car dependent communities: not a single one of them had ended up delivering the sustainability that the developers promised, particularly when it came to transport sustainability.
12. It is also consistent with the Department of Transport's latest National Travel Survey (August 2023)⁴ whose findings include the conclusion that the private car remains by far the most popular means of transport, and that active travel options (especially in rural areas) have a very limited impact on mode of travel choices.

³ <https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf> ⁴ <https://www.gov.uk/government/statistics/national-travel-survey-2023>