

## MSDC24

### Implications of the District Plan Main Modifications on the Ashdown Forest (traffic impact on Special Area of Conservation) and on the strategic and local transport network

1. This note provides a summarised update on the position of the Mid Sussex District Plan (MSDP) with regard to the impact of the District Plan Main Modifications on the Ashdown Forest (traffic impact on the Special Area of Conservation) and on the strategic and local transport network.
2. The District Plan was submitted to the Secretary of State August 2016. At the most recent Examination Hearing sessions, which took place 25<sup>th</sup> and 26<sup>th</sup> July 2017, the Inspector recommended that the Plan could proceed to adoption subject to a number of modifications including an increased housing number.
3. The proposed Main Modifications make provision for an increased housing number and a stepped trajectory requested by the Inspector. The Plan therefore makes provision for 876 dwellings per annum (dpa) to 2023/24, and subject to the outcomes of Habitats Regulations Assessment, for 1,090dpa thereafter to 2031.
4. The increase to 1,090dpa will be achieved through the preparation of a site allocations DPD that will allocate housing and employment sites and by further housing or employment site allocations identified in any new or reviewed Neighbourhood Plans. The Main Modifications also propose the allocation of a further strategic development site in the District Plan located to the north of Clayton Mills, Hassocks for 500 units to bolster the five year housing land supply given concerns raised by the Inspector on the need to strengthen this.

### Traffic impact of the District Plan Main Modifications on the Ashdown Forest

5. MSDC18 (submitted to the Inspector in June 2016) set out the implications of the District Plan on the Ashdown Forest in light of the **Wealden** decision (*Wealden v SSCLG* [2017]), taking into account the implications of the Inspector's interim conclusions of 20 February 2017 (ID11) that set out a higher potential housing provision than 800dpa in the submitted MSDP (a Mid Sussex OAN of 876 and a plan period housing provision of 1,026dpa).
6. MSDC18 explained that it was not possible to model with any certainty additional growth without making assumptions about where that growth would be located. The effects of increased road traffic on the Ashdown Forest are sensitive to the scale and location of the additional housing allocations within the district. As such, MSDC18 concluded that:
  - It is not possible to provide a sound HRA at 1,026dpa as assumptions would need to be made about the locations of several thousand dwellings, many of which are currently considered unsuitable/ unachievable or are unknown and would not be required until the later stages of the plan period; and
  - The submitted District Plan may be regarded as sound and that a sound position is to proceed with the adoption of the housing allocations of the submitted MSDP at 876 dpa, noting that the existing Habitats Regulations Assessment needed updating to reflect the latest modelling.
7. MSDC18 provided the results of updated transport assessments, which reflect **Wealden** (provided within Table 1). The further modelling analysis suggested that at 876 dpa, the uncommitted, additional, (discretionary) housing growth allocated within the Plan results in an overall net reduction of traffic on Ashdown Forest roads of 280 average annual daily traffic movements (AADT), equivalent to about 250 AADT relative to a non-plan reference case. The analysis suggested that there is no net additional traffic through Ashdown Forest from the MSDP because of the improved relationship between homes and jobs and services; and that there will actually be net overall reductions on the Forest roads as a result

of the Plan, although the Plan results in a small increase in traffic on the A275, partly because the effect of the Plan is to divert traffic from other Forest roads onto the A275.

8. The Main Modifications propose the allocation of a further strategic development site in the District Plan, located to the north of Clayton Mills, Hassocks for 500 units, to bolster the five year housing land supply given concerns raised by the Inspector on the need to strengthen this. Further modelling analysis of the main modification suggests that at 876 dpa with the inclusion of this site, the uncommitted, additional, (discretionary) housing growth allocated within the Plan, results in an overall net reduction of traffic on Forest roads of 220 average annual daily traffic movements (AADT), equivalent to about 270 AADT relative to a non-plan reference case. The evidence continues to demonstrate that there is no net additional traffic through Ashdown Forest from the MSDP at 876dpa, with the proposed additional strategic development.

**Table 1: 24 Hour AADT, Effect on links through Ashdown Forest (May 2017 modelling output with September 2017 update)**

24 Hour AADT (two way)						
Link	SATURN Node List		2014		2031	
From	A-Node	B-Node	Present Year	Reference Case	876dpa	876dpa*
A275	3920	4096	5839	7107	7354	7374
A22	8131	4096	4920	6272	6214	6245
A26	3422	4010	3882	4483	4286	4286
B2110	8127	8126	1968	2247	1976	1984
<b>Total</b>	<b>23600</b>	<b>20328</b>	<b>16609</b>	<b>20109</b>	<b>19830</b>	<b>19889</b>
24 Hour AADT (Change from Reference Case two way)						
Link	SATURN Node List		2014		2031	
From	A-Node	B-Node	Present Year	Reference Case	876dpa	876dpa*
A275	3920	4096	-	-	247	267
A22	8131	4096	-	-	-58	-27
A26	3422	4010	-	-	-197	-197
B2110	8127	8126	-	-	-271	-263
<b>Total</b>	<b>23600</b>	<b>20328</b>	<b>-</b>	<b>-</b>	<b>-280</b>	<b>-220</b>

\*876dpa with the inclusion of proposed strategic allocation north of Clayton Mills, Hassocks

9. Air Quality Modelling and ecological interpretation for Habitats Regulations Assessment to test the increase in traffic flows on the A275 as a result of development on the Ashdown Forest Special Area of Conservation (SAC) has been undertaken through Appropriate Assessment (HRA for the Mid Sussex District Plan – Appropriate Assessment Report for the Main Modifications District Plan [September 2017]). The Assessment used the results of the traffic modelling to assess the contribution of the MSDP to future nitrogen deposition within

Ashdown Forest, and to assess the impacts of the Plan on the conservation objectives of the Ashdown Forest, the characteristics of the site and its qualifying features in the context of pollution data to determine whether there will be adverse impacts on site ecological integrity.

10. The Appropriate Assessment demonstrates that the effect of additional traffic on the A275 does not result in adverse effects on the ecological integrity of the qualifying Ashdown Forest SAC habitats as the effect of the District Plan's contribution to nitrogen deposition is neutral. The Appropriate Assessment concludes that adverse effects resulting from atmospheric pollution are not considered likely for the Ashdown Forest SAC and the District Plan can be considered compliant with the Habitats Regulations in respect of the SAC (and Special Protection Area [SPA]) sites.

### **Impact of the District Plan Main Modifications on the strategic and local transport network**

11. The transport impact of the MSDP on the strategic and local transport network is tested through the Mid Sussex Transport Study (MSTS) Stage 3 Report (December 2016 [EP41]). The MSTS finds that the impacts of the District Plan at 800dpa would not greatly affect highway performance in terms of capacity, congestion and traffic delay. This is because certain 'primary', 'secondary' and development site access remedial interventions have already been defined as a requirement to enable future development to take place. Agreement was reached with Highways England and West Sussex County Council (the highway authorities) on the methodology and findings of the MSTS Stage 3 Report, through respective Statements of Common Ground (BP17(i) and BP17(ii)).
12. In numerical terms, for the period 2017/18 - 2023/24, the MSTS assessed the impact of 5,600 dwellings on the highway network (7 years x 800dpa). For 876dpa, the increase amounts to an additional loading of 76dpa on the highway network or a total of 532 dwellings over this time. It is concluded that it is possible that virtually all the required significant transport interventions set out in the MSTS to mitigate the impact of development at 800dpa per annum to 2031 (to support a total of 13,600 dwellings), will be delivered during the period to 2023/24 (therefore supporting a total of 6,132 dwellings). On this basis, further agreement has been reached with the highways authorities that the overall impact on the transport network by the proposed Main Modifications are adequately considered by the MSTS as the proposed transport remedial interventions will adequately address the impacts of the additional 532 units, and that the MSTS provides sufficient evidence to demonstrate that the additional units over this period would also not cause harm to the highway network, subject to the implementation of required remedial intervention. This is on the basis that further transport modelling work will be undertaken to support the delivery of the increase in housing to 1,090 dpa, based on the firm development distribution that would be set by the Site Allocations DPD or future Neighbourhood Plans.
13. Although the transport impact of the Main Modifications on the overall local and strategic road network are agreed to be adequately considered by the MSTS Stage 3 Report published in December 2016, it was considered necessary to undertake further assessment of the impact of development on the local road network at Hassocks and on matters relating to air quality given the proximity of the proposed strategic development to the Stone Pound Crossroad AQMA to ensure that it is likely to be consistent with the Stonepound Crossroad Air Quality Management Plan.
14. A transport assessment has been submitted to the Council to support the proposed allocation of strategic development at Hassocks. This concludes that: the site is accessible by a choice of travel modes; the site is sustainable in transport terms and the use of sustainable transport modes can be maximised through a Travel Plan; safe and suitable access to the site can be achieved (noting the need to assess further junctions in Burgess Hill).
15. The transport assessment undertakes an operational analysis of the local highway network to test the traffic impact of the proposed strategic development. The assessment demonstrates that the highway network within Hassocks will operate satisfactory and the

residual cumulative impact of development are not severe (noting the need to assess further junctions within Burgess Hill).

16. The transport assessment estimates that the proposed strategic development will add around 13-15 additional traffic movements through the A273 / B2116 Stonepound crossroads during a weekday highway network peak hour. This is calculated on the basis of a total of 300 trips to/ from the proposed strategic development during a weekday highway network peak hour (Table 4.1: Vehicle Trip Rates and Trips) of which 4.46-4.88% would route through the crossroads calculated on the distribution of car trips (Table 4.3: Distribution of Car Driver Trips). This distribution is based on the assumption that traffic to and from Brighton will choose to route via Lodge Lane/ Ockley Lane and not through the crossroads. Some additional trips may route via the railway station onwards via the crossroad. The report assumes all 500 proposed dwellings are private houses when policy provision is for 30% which would result in a lower traffic impact. The assessment concludes that the overall impact is negligible as the forecast rates fall well within the daily variation of traffic flow. WSCC agree that this assessment represents a reasonable test of the proposed strategic development impact on the Stonepound crossroads.
17. In conclusion, the evidence base demonstrates that the proposed allocation is unlikely to present unacceptable harm to the local road network or a significant impact at the Stone Pound crossroad and the Air Quality Management Area subject to further testing of road junctions in Burgess Hill.
18. Notwithstanding the above conclusions, policy provision is made in the Main Modifications which requires the provision of transport mitigation to support the proposed strategic development at Hassocks with regard to impact on the local road network and to respond to issues relating to air quality given the sites proximity to the Stone Pound Crossroad AQMA. It also requires that any mitigation measures are consistent with the aims of the Stonepound Crossroad Air Quality Management Plan. Any planning application will also need to submit more detailed transport assessments with any required mitigation measures to support proposals.