



Town & Country Planning
Act 1990 (as Amended)

Appeal by Fairfax
Acquisitions Limited and
The Norris Family

Land East of Ansty Way,
Cuckfield Bypass,
Cuckfield, West Sussex
RH17 5AG

Summary Proof of Evidence

M Stevens MIHT on behalf of
Fairfax Acquisitions Limited and
The Norris Family

PINS Ref: 6002030
LPA Ref: DM/23/2866

May 2026

MILESTONE
TRANSPORT PLANNING

CONTENTS

- 1. Experience & Qualifications..... 1
- 2. Introduction & Scope of Evidence..... 2
- 3. Policy Review..... 4
- 4. Assessment of Locational Sustainability..... 5
- 5. Conclusions..... 7

1. Experience & Qualifications

- 1.1 My name is Matt Stevens, a Member of the Institution of Highways and Transportation and an Executive Director of the firm Milestone Transport Planning Limited. I have 36 years' experience dealing with the highways and transportation implications of a wide range of projects with full assessment under National and Local Planning Policy Guidance.
- 1.2 My evidence is on behalf of Fairfax Acquisitions Limited and The Norris Family (the "Appellant") and in respect of an Outline application with all matters reserved, except means of access to the site, for Land East of Ansty Way, Cuckfield Bypass, Cuckfield, West Sussex RH17 5AG (the "Appeal Site").
- 1.3 The description of development (the "Appeal Scheme"), as set out in the Decision Notice (CD3.3) is:

"Outline planning application (All matters reserved except for access) for the redevelopment of land east of Ansty to create a new Garden Community , comprising the erection of up to 1.450 homes (including 30% affordable housing), up to 90 residential care (C2 units), a primary school, a SEND school, health HUB, sports facilities including all weather hockey pitches and tennis centre, allotments, retail, community and employment uses with ancillary and associated development including new and enhanced pedestrian / cycle routes, open spaces and landscaping."

2. Introduction & Scope of Evidence

- 2.1 The Outline Planning Application (“OPA”) (Ref. DM/23/2866), submitted to Mid Sussex District Council (“MSDC”) in November 2023 was accompanied by a comprehensive suite of technical documents and reports prepared by the incumbent Transport Consultant appointed by the Appellants at that time, Ardent Consulting Engineers (“ACE”).
- 2.2 Throughout the OPA determination period, ACE engaged in extensive consultation and agreed matters with the relevant statutory consultees dealing with highways, transport, accessibility, and sustainability matters. This has included West Sussex County Council (“WSCC”), acting as the Local Highway Authority (“LHA”) as well as their Public Rights of Way (“PRoW”) officers, National Highways (“NH”) as the Highway Authority responsible for the Strategic Road Network (“SRN”) and Active Travel England (“ATE”), the government agency focused on promoting walking, wheeling and cycling.
- 2.3 The MSDC Case Officer’s Report to Committee (CD3.1) at para. 2.14 confirmed that, in transport terms, the application complied with Policy DP21 and the relevant provisions of the Framework, concluding that no severe transport impacts had been identified subject to mitigation and conditions. The report also confirmed that the sustainable transport mitigation / measures delivered by the Appeal Scheme, including the proposed bus services, will benefit existing residents and should be afforded significant positive weight.
- 2.4 Furthermore, the Case Officer’s Report confirmed no objections from the following statutory consultee responses, subject to planning conditions and obligations: WSCC Highways, WSCC Public Rights of Way, Active Travel England, and National Highways.
- 2.5 Despite the recommendation for approval, the OPA was refused by MSDC Planning Committee, with the Decision Notice (CD3.3).
- 2.6 For this Appeal, the Appellant and WSCC have entered into a signed Highways Statement of Common Ground (“HSoCG”). The HSoCG confirms agreement that the Appeal Site adopts a vision-led approach consistent with paragraphs 109, 110 and 115(a) of the NPPF and that the scheme would facilitate limiting the need to travel and provide a genuine choice of transport modes. The HSoCG confirms that there are no highways and transport matters that remain in dispute between the Appellant and WSCC.

-
- 2.7 The Parish Councils, confirmed by PINS as a Rule 6(6) Party, submitted their Statement of Case (“SoC”) on 2 April 2026 (CD15.3). Their case principally concerns the alleged locational unsustainability of the Appeal Site, including claims that local facilities and settlements are inaccessible, that the development would encourage reliance on the private car, and that the proposed bus and active travel connections are constrained and lacking long-term certainty. In light of these concerns, my evidence specifically addresses and responds to the locational sustainability matters raised within the Parish Council SoC.
- 2.8 My evidence demonstrates a comprehensive vision-led approach consistent with paras. 109, 110 and 115 of the Framework. As such, and in my professional opinion, the evidence clearly demonstrates that the Appeal Scheme accords with para. 116 of the Framework. The Appeal Site would not give rise to an unacceptable impact on highway safety, and any residual cumulative impacts on the road network can be effectively mitigated and would not be severe.

3. Policy Review

- 3.1 Section 9 of the Framework, Promoting Sustainable Transport, provides the principal policy framework against which the Appeal Site proposals should be assessed. In particular, paragraphs 109 and 110 require a vision-led approach to transport planning which prioritises sustainable travel, limits the need to travel, and provides a genuine choice of transport modes.
- 3.2 My evidence demonstrates that the Appeal Scheme accords with these objectives through a comprehensive package of active travel, public transport, and highway infrastructure improvements, together with the delivery of on-site facilities which reduce the need for external trips.
- 3.3 Para. 115 and 116 of the Framework further require developments to provide safe and suitable access for all users and confirm that proposals should only be refused on highways grounds where there would be an unacceptable impact on highway safety or where the residual cumulative impacts on the road network would be severe. In my professional opinion, neither test is engaged in this case.
- 3.4 The Appeal Scheme is also consistent with Policies DP20, DP21 and DP22 of the Mid Sussex District Plan, which support sustainable development, active travel enhancements, public transport improvements, and comprehensive infrastructure delivery. Similarly, the proposals accord with the transport-related objectives of the Ansty, Staplefield & Brook Street and Cuckfield Neighbourhood Plans, which support improved walking, cycling and public transport connectivity between settlements.

4. Assessment of Locational Sustainability

4.1 The Parish Councils' assertion that the Appeal Site is inherently unsustainable and incapable of supporting meaningful modal shift is not supported by evidence. My evidence demonstrates that the Appeal Site already benefits from connectivity to facilities, amenities, and local settlements via existing walking, cycling, Public Rights of Way and public transport networks.

4.2 The MSDC Officer's Report to Committee (CD3.1) confirms that the Appeal Site proposals incorporate *"...appropriate opportunities to promote sustainable transport.."*. Further, the agreed position of the Appellant and WSCC, as set out in para. 6.1 of the HSoCG states:

"In accordance with 109, 110 and 115(a) of the Framework, the vision-led approach to the Appeal Site proposals ensures that it is sustainable, and through a comprehensive package of interventions, facilitates limiting the need to travel and enables a genuine choice of transport modes."

4.3 The overall Sustainable Transport Strategy for the Appeal Site is neither aspirational nor uncertain. The Appeal Site will deliver a comprehensive, vision-led package of active travel, public transport and highways improvement strategies and measures that will have a direct and sustained long-term positive impact on the local community through a physical works secured by Conditions and far reaching financial support secured by way of S106 Legal Agreement.

4.4 The comprehensive package of interventions, included as Appendix MS1 and Appendix MS2 of my main proof, and also referenced in para 6.1 of the HSoCG, includes:

- 1) An extensive network of off-carriageway commuter and leisure routes within the Appeal Site for pedestrians and cyclists.
- 2) The means of multi-modal access, including pedestrian / cycle crossings at key off-site locations to secure means of connection with existing infrastructure.
- 3) The provision of a network of Mobility Hubs within the Appeal Site.
- 4) Pedestrian and cycle route improvements to Haywards Heath on the A272 / B2272 corridor and at the B2036 London Road / Ardingly Road mini-roundabout.
- 5) Upgrades to Footpath 62CR to Bridleway specification and improved surfacing on Bridleway 67CR / 50bCU.

4.5 The Active Travel Infrastructure Strategy comprehensively addresses the desire lines for movement between the Appeal Site and the villages of Ansty and Cuckfield, including Warden Park Academy, as well as Haywards Heath town centre and station, and, most importantly, fully meet the needs and safety of walkers, wheelers, and cyclists.

- 4.6 The Appellant is also committed to the delivery of a network of Mobility Hubs, incorporating cycle storage, repair facilities, e-scooter charging / storage, car club provision, EV charging, wayfinding, seating, and integrated public transport facilities delivered in conjunction with the phased release of development on the Appeal Site.
- 4.7 The Appellant is also committed to the delivery of the Bus Service Strategy that, as confirmed by an independent commercial viability assessment, will be commercially viable well in advance of full occupation of the Appeal Site, supported by an interim period of financial contribution during the build-out phase of development.
- 4.8 The Appeal Scheme also delivers substantial on-site facilities and mixed uses including a primary school, SEND school, a health hub with GP surgery, a village centre with retail, employment and community uses, sports and recreational facilities. These comprehensive facilities will serve to reduce the need to travel and enable a proportion of development-related trips to be internalised.
- 4.9 The Highway Infrastructure Package for the Appeal Site is fully agreed with WSCC. Alongside each phase of development, and in most cases, prior to the first occupation within that phase, the necessary connections to the local highway network and any triggered off-site highway mitigation will be delivered.
- 4.10 As confirmed in the ACE Transport Addendum (May 2025) (CD2.11) the detailed modelling evidence base compellingly demonstrates that residual impact of the proposals on the wider highway network would not be severe, having regard to the requirements of the Framework, under a 2039 future year forecast scenario with full development on the Appeal Site.
- 4.11 The HSoCG (CD7.2) confirms agreement between the Appellant and WSCC that, subject to the delivery of off-site highway mitigation at the A272 / Tylers Green / Issac's Lane roundabout, minor works to the B2036 London Road / Ardingly Road mini roundabout in Cuckfield, and widening of the western approach arm to the A272 / Bolney Road / B2036 mini roundabout in Ansty, the Appeal Scheme would not result in an unacceptable impact on highway safety or severe residual cumulative impacts on the road network.
- 4.12 In terms of monitoring these measures, the Appellant and WSCC have reached agreement on the implementation of a Trip Monitoring Strategy that, alongside the Travel Plan review process, which will scrutinise the successfulness, or otherwise, of the comprehensive package interventions to be delivered.

5. Conclusions

5.1 My evidence demonstrates that the Appeal Site is capable of delivering a genuinely sustainable pattern of development consistent with national and local planning policy.

5.2 Overall, I conclude that:

- The Appeal Site is sustainable in transport terms;
- The Appeal Scheme offers a genuine choice of transport modes;
- The comprehensive active travel and public transport strategy is robust, deliverable, and viable;
- There would be no unacceptable impact on highway safety; and
- The residual cumulative impacts on the road network would not be severe.

5.3 In light of the above, the Parish Councils' assertion that the Appeal Site is inherently unsustainable and incapable of supporting meaningful modal shift is not supported by evidence and fails to properly account for the agreed HSoCG position with WSCC or the aforementioned comprehensive, vision-led package of improvement strategies and measures.

5.4 Accordingly, in relation to highways, accessibility and transport matters, the Appeal Scheme accords with para. 109, 110, 115, and 116 of the NPPF together with Policies DP20, DP21 and DP22 of the Mid Sussex District Plan and the relevant transport policies of the neighbourhood plans.

5.5 For these reasons, I respectfully conclude that there are no highways, accessibility or transport grounds which justify dismissal of the Appeal, and I therefore respectfully request that the Inspector allows the Appeal.