

West Sussex County Council Hearing Statement for Mid Sussex District Plan 2021-39

Matter 7 – Site Allocations

Statement in respect of transport matters

For sites DPSC1, DPSC2, DCSP3, DPSC4, DPSC5, DPSC6, DPSC7, DPA7 and DPA12 (unless specified)

The County Council has been working with Mid Sussex District Council on the Mid Sussex Transport Study since summer 2021 to ensure that the transport evidence for the spatial strategy of site allocations has been developed on a sound footing, reflecting the forecasted changes in travel demands and likely changes in behaviour resulting from the development of these sites. This evidence has been used to help develop a package of transport improvements covering new and amended infrastructure and transport services, as well as on-site facilities on large and strategic sites that will need to come forward as development takes place to help to minimise the needs for regular off-site travel.

The county council has also provided early feedback to help to shape the transport, site allocation and development management policies to ensure that the policy framework will facilitate delivery of the transport package for the District over the Plan period. An important part will be ensuring that sites are well served with frequent and reliable public transport services and attractive active travel connections which are deliverable within viability constraints and integrate the developments within the wider transport network. In addition, capacity increases for general motor traffic are proposed at a small number of key junctions on the principal movement routes in the district near to the strategic allocation sites, to allow network efficiency to be maintained and also to prevent traffic delays from undermining journey reliability for new and existing public transport routes or from spreading through traffic onto unsuitable rural routes or residential streets, which otherwise would have the effect of making them less attractive for cycling and walking.

- a) How good urban design would be created, including good building design, legible layouts, attractive streets and open spaces, active frontages, the integration of sustainable transport and climate change mitigation

Good urban design in new allocation sites, notably the strategic sites DPSC1-7, will be key to achieving high sustainable travel mode shares, reducing the need to travel and high levels of internalisation of trips generated from the new homes on these sites. These factors are expected to work in combination to reduce the level of vehicular trips generated with remote trip ends external to the sites. The county council is satisfied that the policies in the submission Plan as proposed to be modified in the district council's schedule of main modifications (DP2) dated July 2024 following regulation 19 consultation are sufficient to achieve these objectives. The policies are expected to facilitate development of legible internal layouts with safe, attractive and convenient cycling and walking routes between homes, on site facilities and bus stops and to nearby existing local facilities and employment locations, where these are present.

The county council's preference is for comprehensive developments to come forward as this provides the best prospect of delivering the infrastructure required to deliver the local plan vision. To achieve this for the Sayers Common sites DPSC3-7 will require a collaborative and coordinated process to help the smaller sites DPSC4-7 contribute to and integrate with the masterplanning vision for shared facilities that will largely be located within the largest site in the village DPSC3. This will be dependent on financial contributions through planning obligations from all site allocations that rely on the infrastructure and services, agreements between developers over arrangements for delivery of off-site infrastructure and on-site infrastructure being delivered that is co-terminus between sites. A failure to deliver this would undermine the achievement of the overall vision for the area.

- b) The implications for the wider transport network (including the impact on nearby communities) and how necessary mitigation measures would be delivered

The proposed strategic site allocations DPSC1-7 and all the non-strategic site allocations have been modelled on the Mid Sussex Strategic Transport Model developed by the district council's consultant, Systra, in close liaison with the county council. The county council is agreed with the district council that the model has been developed to an appropriate methodology and standard and that any changes to traffic patterns since the model base year of 2019 have been accounted for in reporting to enable an appropriate interpretation of forecasting outputs.

This model and methodology have been used to develop a sustainable transport package which can be expected to mitigate transport impacts on the county council's highways network to a level compliant with national policy as set out in

NPPF. However, traffic forecasting is uncertain and it is possible that different outcomes could occur in the future, so, to manage uncertainty, site-specific monitoring and fall-back measures will be needed that could come forward in the future, if circumstances require.

The model forecasting has indicated that there are likely to be two exceedances of the highway capacity criteria set at the start of the Mid Sussex Transport Study; at the B2110 Turners Hill junction with B2028 North St and Selsfield Rd (locally known as Turners Hill crossroads); and, at the A273 London Rd/Brighton Rd junction with B2116 Hurst Rd and Keymer Rd (locally known as Stonepound Crossroads) in Hassocks. However, the county council is satisfied that as these issues are relatively small, these issues are likely to be adequately mitigated by the dynamic responses of road users through changes to travel behaviour such as altering travel times, trip frequency, destination or travel mode. This is because the model is only capable of using re-routing as the primary response to congestion.

In addition, local pedestrian and cycle improvements are planned around the junctions to mitigate the impacts of additional traffic on non-motorised users. Neither of these locations forms part of the county council's strategic road network so, in line with the road hierarchy, the needs of non-motorised users are a high priority. Through the planned development-funded improvements to the strategic route between Burgess Hill and the south coast via the A2300 and the A23, the transport mitigation package seeks to minimise the number of additional vehicular trips along the length of the A273 enabling the road there to better serve local demands near Hassocks.

To deliver the complete transport mitigation package to mitigate the local plan demands in a sound manner will require full coordination between the site promoters, the planning and highway authorities, particularly to secure delivery of off-site infrastructure. This is planned to be achieved through a "monitor and manage" process, administered through a Transport Infrastructure Management Group (TIMG) on which the planning authority and the local and strategic highway authorities are permanently represented while other stakeholders, such as transport operators, site promoters and neighbouring planning and local highway authorities can be brought in or consulted as and when required.

The group is advisory rather than decision making with recommendations made to the relevant constituent authorities to act under their own policies and powers. The county council is satisfied that the policies in the local plan as modified support the operation of this monitor and manage process - subject to further text under separate heading below in respect of main modification M54 - by the TIMG and reports that the group has already been set up with the district council and National

Highways and that the group has agreed its terms of reference so that it can manage transport infrastructure delivery as planned.

Development Management Policies; Main Modifications

While formal matters have not been issued for comment in respect of development management policies, the county council notes that day 12 of the hearings is marked for any necessary discussion on main modifications, so hopes that the following representation can be taken into account in lieu of attendance on that day in respect of main modification M54.

It is essential for the coordinated delivery of the transport mitigation package that the policy and text of the Plan supports the monitor and manage process. This is a strategic matter on which the district council and county council have agreed an approach as outlined in a Statement of Common Ground (DC15). The monitor and manage process depends on; a) securing the delivery of infrastructure and services (and any necessary fall-back measures) and site-specific monitoring through planning obligations; and b) delivery of off-site infrastructure and services by infrastructure providers. As the district council is not generally responsible for the transport network, it relies on infrastructure providers such as the county council in its role as the Local Highway Authority to deliver off-site improvements. The monitor and manage process is referenced in DPT1 as modified by the district council in M52 which will assist with this, but the county council wishes to express its disappointment that the modification to supporting text to DPT1 at main modification M54, which the county council had agreed with the district council to specifically support this process has now been proposed to be withdrawn as being “not necessary” due to being “added background description”.

The county council disagrees with this description of modification M54 and believes that it is important for the effective and correct application of policy DPT1 for three principal reasons:

1. Some transport infrastructure and services associated with previous development plan documents has failed to come forward. This is due to a disconnect between the land-use and transport planning systems and competing priorities for investment that have not always prioritised transport mitigation measures. M54 is intended to help address this issue by setting out how the relevant authorities will work together to deliver the Plan.
2. M54 defines the monitor and manage approach; while monitor and manage has been set up elsewhere in the country it is not yet something with an agreed national

definition in government policy to the county council's knowledge. Hence the county council's view is that providing explanatory text here will help the district council to enforce and consistently apply DPT 1.

3. M54 introduces the nominally titled Transport Infrastructure Management Group (TIMG) as a key forum for bringing the district council and infrastructure providers together to jointly consider monitoring information and recommend priorities for investment to manage the issues as part of applying the monitor and manage process. The county council's view is that retention of this text in the Plan will assist the TIMG in its operation by giving credibility to its role in facilitating delivery of the Plan. The undertaking in text in the Plan to operate this group provides a reason why the group should be retained at least through the plan period through any upcoming changes to local authority boundaries and organisation or future changes in political control.

For these reasons the county council requests that the main modification M54 is retained to facilitate the process required to deliver the Plan in respect of its site allocations and the supporting sustainable transport mitigation package.