

Document: Sustainability Statement Main Modifications
Site: Land at Colwell Farm, Lewes Road, Haywards Heath
PINS Ref: **6005786**
Date: August 2026

INTRODUCTION

- 1.1 This technical note is prepared by John Russell on behalf of the Protect Colwell Farm Action Group (hereafter referred to as 'the Rule 6 Party').
- 1.2 It considers the following documents submitted by the Appellant during the course of the Inquiry:
- Sustainability Assessment for the Main Modifications (SAM)¹; and
 - SSP8: Post Hearings – Site Selection Review – Final Conclusions (SSR)² and appendices (SSR1³ and SSR2).

SUSTAINABILITY ASSESSMENT – GENERAL OBSERVATIONS

- 1.3 The methodology adopted within the SAM makes no reference to established national guidance concerning walkable neighbourhoods or accessibility planning, despite such guidance being fundamental to the assessment of sustainable locations. The methodology appears to have been developed specifically for this Local Plan examination rather than following an established appraisal framework. As such, its robustness remains untested and will require examination through the Local Plan Examination in Public (EiP).
- 1.4 It should also be recognised that a Sustainability Assessment is intended primarily to assess the performance of the Local Plan as a whole rather than undertake a detailed appraisal of the merits of individual site allocations. The level of information available during plan preparation is rarely sufficient to undertake a comprehensive assessment of individual sites against every sustainability objective.
- 1.5 Furthermore, the methodology by which individual sites are scored against the assessment objectives lacks transparency. The basis for assigning positive, neutral

¹ ID13

² ID14

³ ID14a

or negative scores is not readily apparent and cannot be independently replicated or verified.

- 1.6 It is respectfully suggested that the Inspector should attach only limited weight to the findings of the SAM for the following reasons:
- a. The assessment criteria are not referenced against recognised national guidance or an established methodology.
 - b. The adoption of a 15-minute walking threshold to local facilities is unsupported by evidence or policy justification.
 - c. The relative weighting afforded to each assessment criterion is neither explained nor quantified, making it impossible to understand how overall scores have been derived.
 - d. The appropriateness and reasonableness of the SAM is yet to be tested at EiP.
- 1.7 The limitations of the assessment are illustrated by inconsistencies within the supporting documentation, suggesting that the individual site assessments have not been subjected to detailed scrutiny.
- 1.8 Accordingly, whilst the SAM may serve as an appropriate strategic tool for comparing broad spatial options during Local Plan preparation, its methodology is inherently high-level and has yet to be tested through the EiP. It lacks the precision, consistency and transparency necessary to assess the detailed planning merits of an individual planning application or appeal proposal.

COLWELL FARM (THE APPEAL SITE)

- 1.9 Within the SAM, the Appeal Site is identified as Site 844 with a proposed allocation of approximately 80 dwellings. The SAM also identifies a separate draft allocation, Site 680, comprising approximately 9 dwellings. Site 680 appears to form part of the wider Site 844 landholding but is located closer to the proposed access from Lewes Road and is clearly dependent upon the delivery of Site 844 and its access arrangements.
- 1.10 The transport and accessibility assessment of Sites 680 and 844 is presented in the table commencing on pdf page 81 of the SAM, where Site 680 is identified as Site A and Site 844 (the Appeal Site) as Site B.

- 1.11 The assessment indicates that accessibility has been measured from the approximate centre of each site rather than from the point of access on Lewes Road. This is evidenced by the conclusion that Site 680 performs better than Site 844 in relation to accessibility, despite both sites sharing the same vehicular and pedestrian access from Lewes Road. This reinforces that connectivity to everyday destinations should be measured from the approximate centre of a site rather than the first point of contact with the existing highway network.

SAM TRANSPORT-RELATED SUSTAINABILITY OBJECTIVES

- 1.12 The transport-related elements of the SAM are contained within the following objectives:
- a. Objective 2 – Health and Wellbeing;
 - b. Objective 3 – Education;
 - c. Objective 4 – Community and Crime; and
 - d. Objective 10 – Climate Change and Transport.
- 1.13 The Council concludes that overall, the Appeal Site performs as follows (pdf page 10):
- a. Neutral against Objective 2.
 - b. Minor Negative against Objective 3.
 - c. Neutral against Objective 4.
 - d. Neutral against Objective 10.

ASSESSMENT INDICATORS

- 1.14 These objectives are assessed, inter alia, against the following accessibility indicators:
- a. Within a 15-minute walk of a GP surgery, health centre or hospital.
 - b. Within a 15-minute walk of a primary school.
 - c. Within a 15-minute walk of community facilities.
 - d. Within a 5-minute walk of a bus stop served by a frequent service (three or more buses per hour).
 - e. Within a 10-minute walk of a bus stop served by a less frequent service (fewer than three buses per hour).

- f. Within a 15-minute walk of a railway station.
- g. Within a 30-minute public transport journey, or a 15-minute walk or cycle, of a superstore or high street.
- h. Within a 30-minute public transport journey, or a 15-minute walk or cycle, of a convenience store.

1.15 I note that the methodology provides no explanation of the relative weighting between the various indicators. For example, it is unclear how the 5-minute and 10-minute bus accessibility criteria are combined or weighted.

1.16 Similarly, the assumption that a 30-minute public transport journey to access a local convenience store represents sustainable accessibility appears unrealistic. In practical terms, it is highly unlikely that residents would undertake such a journey for routine convenience shopping where alternative facilities exist and indeed such an assertion is unfounded in any guidance.

REVIEW OF THE SAM ASSESSMENT

1.17 The detailed assessment contained within the table commencing on SAM pdf page 81 raises a number of methodological questions and, in my opinion, lacks sufficient transparency to explain how the overall scores have been derived.

1.18 The Council's assessment of the Appeal Site (and I emphasise that this is the Council's assessment and not mine) against its accessibility indicators is summarised as follows:

- a. The Appeal Site lies beyond a 15-minute walk of a GP surgery and therefore fails the health accessibility criterion.
- b. The Appeal Site lies beyond a 15-minute walk of a primary school and therefore fails the education criterion.
- c. The Appeal Site lies beyond a 15-minute walk of community facilities and therefore fails the community accessibility criterion.
- d. No assessment is provided regarding the frequent bus service criterion. However, I note that both the Appellant and the Rule 6 party agree that the Appeal site is not within a 5-minute walk (ca.400m) of a bus stop.
- e. No assessment is provided regarding the less frequent bus service criterion.

- f. No assessment is provided regarding access to a railway station. However, I note that both the Appellant and the Rule 6 party agree that the Appeal site is not within a 15-minute walk (ca.1,200m) of a railway station.
- g. The Appeal Site does not satisfy the accessibility criterion relating to a superstore or high street.
- h. The Appeal Site is recorded as satisfying the convenience store criterion. However, within the SAM, this can only have been met through cycling accessibility because the Council acknowledges that both the public transport and walking thresholds are exceeded.

1.19 Based on the assessment information provided in the table starting on pdf page 81 of the SAM, the Council's conclusion that the Appeal Site scores Neutral against objectives 2, 4 and 10 is incomprehensible and unfounded in fact.

SSR ASSESSMENT

1.20 The SSR text makes no reference to the Appeal Site draft allocation other than listing it in Table 1 (pdf page 6). Unhelpfully the SAM draft allocation reference of 844 is changed to MM66. The same is the case for SAM draft allocation reference 680 which is mentioned only in the same table and whose reference is changed to MM65.

1.21 SSR1 provides a summary of site-specific sustainability assessments. SSR1 reverts to referring to the Appeal Site as 844. The assessment commences on pdf page 249 with sustainability / Access to Services set out on pdf page 250 which I have reproduced below:

Part 3 - Sustainability / Access to Services		
10. Bus Service	Fair	Access to Public Transport and/or frequency of Public Transport in this location is fair
10. Train Service	Poor	
10. Public Transport	Neutral	
11. Main Service Centre	Negative	Journey likely by car only(greater than 20 minutes walk, over 30 minutes public transport)
12. Primary School	Positive	Within 15 minutes walk
13. Health	Positive	Within 15 minutes walk
14. Retail	Positive	Within 15 minutes walk

- 1.22 Referring to items 11, 12, 13, and 14 in the table above I make the following observations:
- a. SSR1 concludes that Journeys to the Main Service Centre are likely to be made by car only due to the walking and public transport travel times. The SAM makes no comment on this.
 - b. SSR1 concludes that there is a primary school (item 12) within a 15-minute walk. The SAM (pdf page 82 under Objective 3 - Education) assesses the Appeal Site as being between 15 and 20 minutes' walk to a primary school.
 - c. SSR1 concludes that there is "health" (item 13) within a 15-minute walk. The SAM (pdf page 81 under Objective 2 - Health and wellbeing) assesses the Appeal Site as being between 15 and 20 minutes' walk to the nearest GP surgery.
 - d. SSR1 concludes that there is "retail" (item 14) within a 15-minute walk. The SAM (pdf page 82 under Objective 10 - Climate Change and Transport) assesses the Appeal Site as being "*within a 15-minute walk from local facilities*" but in the next sentence in relation to "*public transport access to local facilities*" as being "over 30 minutes" from these.
- 1.23 In short, the sustainability assessment currently being presented by the council in relation to the draft Local Plan, and which has yet to be tested at EiP, is inconsistent between the SSR and SAM. It is suggested that little weight can be placed in these at this time pending the Council reviewing and correcting these inconsistencies during the EiP.
- 1.24 Turning to public transport (SSR item 10), the SSR provides no information regarding how the assessment of "fair" and "poor" have been arrived at for bus services and train services.
- 1.25 In the absence of any updated assessment methodology, I have assumed that the Site Selection criteria set out in the document SSP3⁴ have continued to be applied. I understand that SSP3 is the document that provides the assessment framework that the Council has relied on in assessing a site's suitability for selection.

⁴ CD7.9a

1.26 Criteria 10 of SSP3 sets out the availability of Public Transport criteria for the assessing sites. I have copied below the assessment criteria:

Source		MSDC Sustainability Mapping (GIS)				
Assessment	Bus Service		Distance			
			400m	600m	800m	800+m
	Frequency	Excellent (4+/hour)	Excellent	Good	Good	Fair
		Good (2+/hour)	Good	Good	Fair	Fair
		Fair (<2/hour)	Good	Fair	Fair	Poor
		Poor (Infrequent)	Fair	Fair	Poor	Poor
	Train service		Distance			
			<800m	<1.2km	<1.6km	>1.6km
			Excellent	Good	Fair	Poor

	Overall assessment		Train Service			
			Excellent	Good	Fair	Poor
	Bus Service	Excellent	Excellent	Good	Good	Fair
		Good	Good	Good	Fair	Fair
		Fair	Good	Fair	Fair	Poor
		Poor	Fair	Fair	Poor	Poor
		Access to Public Transport and/or frequency of Public Transport in this location is poor				
		Access to Public Transport and/or frequency of Public Transport in this location is fair				
		Access to Public Transport and/or frequency of Public Transport in this location is good				
		Access to Public Transport and/or frequency of Public Transport in this location is excellent				
Note		Measured using the most practical walking route from the centre of the site to the nearest Public Transport. Based on MSDC Sustainability standards.				

1.27 Referring to the extract above, it is immediately self-evident that the Council's Bus service distance criterion of 800+m is irrational. This is because every bus stop in the country further away than 800m would meet this criterion. Little weight should therefore be placed on this criterion.

- 1.28 I also point out that the note to the table s clear that the relevant distance should be measured *"from the centre of the site"*.
- 1.29 It is common ground with the Appellant (ID2 paragraph 5.8) that there are no bus stops within 800m of the mid-point of the Appeal Site. At the very best, overlooking the irrationality of having an open-ended walk distance to a bus stop, the Appeal Site would be classed as "fair", which aligns with the SSR1 item 10. As an example bus services in the centre of London are 800+m from the Appeal Site and provide 4+ services per hour thereby meeting this criterion.
- 1.30 With regards to access to a railway station, it is common ground with the Appellant (ID2 paragraph 5.10) that the nearest railway station is 3,455m from the mid-point of the Appeal Site. On this basis, the Appeal Site would be classed as "poor", which aligns with the SSR1 item 10.
- 1.31 Applying the distance to the railway station ("poor") to the Bus accessibility ("fair" - at the very best) results in an overall assessment outcome of "Poor". This is clearly in contrast to the Council's overall assessment in SSR1 which is that public transport access is "neutral". The Council provides no explanation of how they have arrived at the outcome of "neutral" when their own assessment methodology clearly demonstrates that access is "poor".
- 1.32 The examples set out above demonstrate that the Sustainability Assessment may be appropriate as a high-level strategic tool for comparing broad spatial options during the preparation of the Local Plan.
- 1.33 However, it lacks the consistency, transparency and level of detail necessary to provide a robust assessment of the planning merits of an individual planning application. Furthermore, the methodology has yet to be scrutinised through the EiP, during which a number of the inconsistencies and methodological deficiencies identified above may be addressed.
- 1.34 Until that process has been completed, only very limited weight should be afforded to the detailed conclusions of the Sustainability Assessment in the determination of this appeal.

CONCLUSION

- 1.35 This Technical Note demonstrates that the Sustainability Assessment for the Main Modifications (SAM) and the supporting Site Selection Review (SSR) contain a

number of methodological deficiencies and internal inconsistencies which significantly diminish their value in the determination of this appeal.

- 1.36 The SAM has been prepared as a strategic appraisal to inform Local Plan preparation. It is not a detailed assessment of the planning merits of individual sites and, by its very nature, lacks the precision, transparency and consistency required to assess an individual planning application. Furthermore, its methodology has not yet been scrutinised through the Local Plan Examination in Public (EiP), where its assumptions, assessment criteria and scoring methodology will be tested.
- 1.37 The examples identified in this note demonstrate inconsistencies both within the SAM itself and between the SAM and the SSR. In several instances, the Council's own assessment identifies that the Appeal Site fails the majority of the accessibility criteria, yet the overall sustainability outcomes are recorded as "Neutral" without any transparent explanation as to how those conclusions have been reached. Similarly, the SSR reaches conclusions which are inconsistent with both the SAM and the Council's published assessment methodology.
- 1.38 In the absence of a transparent, evidence-based methodology capable of being independently understood and replicated, it is not possible to have confidence in either the detailed scoring of the Appeal Site or the conclusions drawn from those scores. Consequently, the findings of the SAM and SSR with respect to transport sustainability should be afforded only very limited weight in the determination of this appeal.
- 1.39 My conclusion does not suggest that the Sustainability Assessment has no role in the Local Plan process. Rather, it recognises that it is a strategic plan-making tool whose methodology remains subject to examination through the EiP. Until that process has been completed and the identified inconsistencies resolved, it should not be relied upon as determinative evidence of the sustainability of the Appeal Site within the context of this appeal.

