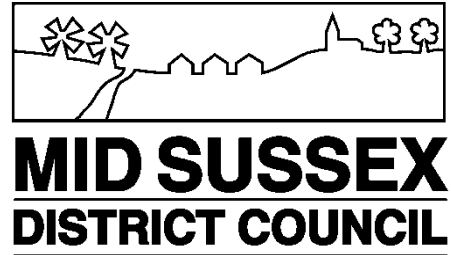


**Mid Sussex
District Council**



Site Allocations DPD

MSDC 21: Response to Infrastructure First –
Interpretation of Cumulative Impacts in respect of
MM2

10 February 2022

Main Modification 2 (MM2) – Interpretation of Cumulative Impacts paragraph 111 of the NPPF

Cumulative impacts as assessed by the Mid Sussex District Council Strategic Transport Model

MSDC Response

- 1.1. The Council's response to Matter 6 [\[Reference MSDC – 02f\]](#) sets out how 'cumulative impact' has been determined and assessed through the Mid Sussex Strategic Transport Study [\[T7\]](#) in accordance with paragraph 111 of the National Planning Policy Framework (NPPF). The Council's position is directly informed by advice from West Sussex County Council (WSSC) in their capacity as Highway Authority.
- 1.2. As stated in the Council's Matter 6 response, in order to determine 'cumulative impacts' on the highway network, forecast flows from committed developments and associated mitigation and committed highway infrastructure are taken account of, for both allocated and permitted sites or sites with a minded to grant resolution. In addition, forecast growth and flows from committed strategic developments in neighbouring districts are taken into account, this data collectively forms the Reference Case which represents the road network at 2031.
- 1.3. In order to determine the cumulative impacts of the Sites DPD development on the road network, the first stage is to model the baseline (Reference Case) from which the additional impacts associated with the Sites DPD development can be identified and supporting infrastructure assessed in 2031.
- 1.4. The Strategic Transport Study [\[T7\]](#) assessment of the Sites DPD development is cumulative as it assesses the proposed allocations in the plan on top of existing allocations and approved development with their associated committed highway and transport network changes. Where junctions are assessed as being severely impacted by the Sites DPD development, sustainable and highway mitigation schemes are proposed and tested to remove any severe impact.
- 1.5. In accordance with the requirements of paragraph 111 of the NPPF, the evidence base produced in support of the Sites DPD demonstrates there would be no severe residual cumulative impacts on the road network remaining following implementation of proposed mitigation. The evidence base has been developed in partnership with WSSC HA and accords with their interpretation of the NPPF. No objection has been raised by any neighbouring authority regarding the quality or conclusions of this work, which has also been validated by National Highways.

Site Allocations DPD Hearing Sessions on definition of 'cumulative impacts'

- 1.6. Hearing sessions for the Sites DPD were held between 1 and 16 June 2021. The definition of cumulative impacts was discussed at three separate sessions under Matter 3 and Matter 6 on: 3 June in relation to proposed site allocations SA12: Land South of 96 Folders Lane and SA13: Land East of Keymer Road and South of Folders Lane; 11 June regarding SA19: Land South of Crawley Down Road and SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane; and on 15 June in

relation to Matter 6. All Parties had a full opportunity to express their views on how cumulative impacts should be assessed and submissions were made referring to an Appeal at Kidnappers Lane, Leckhampton [[Ref: M3-615 Matter 3](#)] and High Court Decision in respect of Hawkhurst Parish Council [[Ref: M3-691 Matter 3](#)], each of which were added to the Examination Library shortly after the session and submitted to the Inspector.

- 1.7. Mr Parfect attended the sessions to represent WSCC HA and confirmed the validity of the Strategic Transport Study and the approach adopted to determine cumulative impacts. Mr Parfect confirmed the methodology is appropriate and that in transport planning methodology it is standard practice to include commitments (both development and infrastructure) in the area within the Reference Case in order to determine cumulative impacts. He also confirmed that this position has been agreed by National Highways.

Conclusion

- 1.8. The issue raised by Infrastructure First in their submission [REP-2383-010] has been discussed at length during the examination – both in writing, and at three hearing sessions.
- 1.9. As described above, the approach taken with respect to the definition of ‘cumulative impacts’ is based on standard practice by the expert transport consultant (Systra), confirmed as appropriate by the Highways Authority (West Sussex County Council) and National Highways, and is consistent with the approach taken in transport studies supporting adopted Local Plans and Development Plan Documents within the County and beyond.