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

Rebuttal 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

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1. Experience & Qualifications

Qualifications

1.1 My name is Matt Stevens. My qualifications and experience are set out within my main evidence (CD8.4).

1.2 As per my main evidence, this rebuttal proof is on behalf of Fairfax Acquisitions Limited & 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 I confirm that the opinions expressed in this rebuttal are true and professional.

Scope of Rebuttal Evidence

1.4 This rebuttal has been prepared to address the highways and transport matters identified in the Rule 6(6) evidence submitted on behalf of the Parish Councils by Mr David Gwyn Lewis (CD10.3) in respect of the Appeal Site.

1.5 The purpose of this rebuttal is to address and respond to evidence submitted by Mr Lewis regarding the accessibility and sustainability credentials of the Appeal Site, including:

- The accessibility of the Appeal Site by walking, cycling, and public transport, including matters relating to journey distances, route quality, and the application of the Department for Transport ("DfT") Connectivity Tool;
- The contention that the Appeal Site would not provide a genuine choice of transport modes for the benefit future occupiers of the Appeal Site;
- The viability and deliverability of the proposed bus services, including criticisms of the mode share assumptions adopted within the transport evidence; and
- The scope, appropriateness, and proportionality of mitigation measures and obligations package that supports the Appeal Scheme.

1.6 This rebuttal should be read alongside my main evidence (CD8.4), the Highways Statement of Common Ground ("HSoCG") signed by both West Sussex County Council ("WSCC"), acting as the Local Highway Authority ("LHA"), and submitted to the Inspector as a Core Document (CD7.2); together with the technical evidence contained within the Core Documents.

1.7 Crucially, para. 4.4 of the signed HSoCG (CD7.2) states that:

> *"Through the transport measures that form the vision adopted for the Appeal Site, it is interconnected with the existing residential populations of Ansty, Cuckfield and Haywards Heath by active travel modes (foot and cycle) and public transport (bus), and also with Burgess Hill by public transport (bus), thereby also offering an enhancement for existing residents."*

1.8 The rebuttal does not seek to respond to every point raised by Mr Lewis. Rather, it focuses on those issues where clarification is required, where there is a material difference in professional interpretation, or where new emphasis has been introduced since submission of my main evidence (CD8.4).

1.9 Accordingly, where a highways matter raised by Mr Lewis is not expressly addressed within this rebuttal, this should not be taken to indicate my agreement with, or acceptance of, the matter. My position on all other matters remains as set out within my main evidence (CD8.4).

2. Assessment of Locational Sustainability

Baseline Conditions

2.1 The majority of Mr Lewis' Section 3 evidence primarily describes existing baseline conditions in the vicinity of the Appeal Site.

2.2 Whilst there are some discrepancies between the baseline conditions described by Mr Lewis and those detailed in Section 4 of my evidence (CD8.4), these are not material to the overall conclusions reached. For example, Mr Lewis excludes amenities accessible by cycle from Table 3.1 of his evidence, notwithstanding that national guidance recognises cycling as a realistic and appropriate alternative to private car use for a wide range of local journeys (refer to Table 4.1 of my evidence).

2.3 Importantly, I acknowledge that there are existing limitations within the current walking, cycling, and public transport environment. However, paras. 115 and 116 of the NPPF make clear that developments should be assessed having regard to the effectiveness of proposed mitigation measures and whether any residual cumulative impacts would be severe following mitigation.

2.4 Additionally, para. 135(a) of the NPPF requires planning policies / decisions to ensure that developments *"…will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development…".*

2.5 As set out within my main evidence (CD8.4) and reflected throughout the agreed HSoCG with WSCC (CD7.2), the Appeal Scheme delivers a comprehensive and vision-led package of active travel, public transport, and highway mitigation measures in accordance with para. 115(d) of the NPPF. Collectively, these measures will materially enhance the accessibility and long-term sustainability of the Appeal Site, consistent with the objectives of para. 135(a) of the NPPF.

2.6 Accordingly, the relevant consideration for the purposes of this Appeal is the accessibility and sustainability of the Appeal Site following implementation of the proposed mitigation and transport strategy, rather than a consideration of existing baseline conditions in isolation.

DfT Connectivity Tool

2.7 Paras. 3.1.1 to 3.1.6 of Mr Lewis' evidence (CD10.3) provides commentary on outputs from DfT's Beta Transport Connectivity Tool.

2.8 The DfT's Beta Transport Connectivity Tool measures an individual's ability to reach employment, services, and social engagements via walking, cycling and public transport to reach jobs, shops, schools, healthcare, and other essential services.

2.9 The online guidance published with the Beta Transport Connectivity Tool states that *"…we* [DfT] *calculate an overall score, which is the weighted sum of all connectivity scores for each purpose and mode of travel for that starting location…".*

2.10 DfT also state that "*…to compare the scores across different starting locations, they are scaled such that the starting location with the best score receives a scaled score of 100 and all other areas receive a score which is relative to that. As such, a starting location with a score of 50 is considered to be half as 'connected' as the best location in England and Wales."*

2.11 Accordingly, the tool provides a relative and comparative metric rather than an absolute measure of accessibility or sustainability. It does not determine whether a location is suitable for development in planning terms, nor does it replace site-specific evidence.

2.12 The published guidance also identifies several limitations, including the fact that the connectivity metric does not account for qualitative factors such as route attractiveness, safety, lighting, surface condition, crossing provision, or the effect of local mitigation measures and infrastructure improvements.

2.13 This limitation is material in the context of the Appeal Site, where Section 4 of my main evidence (CD8.4) identifies a comprehensive package of sustainable travel enhancements capable of being secured through planning obligations and highway agreements.

2.14 Within the Draft NPPF (December 2025), Policy TR1 titled *'Vision-led approach to planning for transport'* states that *"…The Connectivity Tool (Connectivity Tool - GOV.UK) should be used to inform the assessment and selection of sites for development alongside other relevant evidence…".*

2.15 Whilst Policy TR3 titled *'Locating development in sustainable locations'* states that *"The Connectivity Tool (Connectivity Tool - GOV.UK) should be used alongside other relevant evidence in assessing the connectivity of particular locations proposed for development."*

2.16 The Draft NPPF therefore confirms that the Connectivity Tool is intended to inform, rather than determine, judgments relating to accessibility and sustainability, and must be considered alongside other relevant evidence.

2.17 In this regard, the detailed evidence submitted by the Appellant during the OPA and determination periods, together with the assessments presented within my main evidence (CD8.4), provides a materially more robust assessment of the Appeal Site's accessibility than reliance on the Beta Transport Connectivity Tool alone. Of note, and as detailed in para. 4.2 of the HSoCG (CD7.2) the Appellant and WSCC agree the basis on which the accessibility and sustainability of the Appeal Site has been assessed.

2.18 Notwithstanding the above, para. 3.1.4 of Mr Lewis' evidence (CD10.3) states that:

> *"The analysis shows the Appeal Site achieves a connectivity score of between 26 and 39 out of 100 across the site. I consider this demonstrates that the site has poor connectivity by walking, cycling and public transport."*

2.19 Whilst para. 3.1.6 states that:

> *"The analysis shows the Appeal Site achieves a connectivity score of between 18 and 32 out of 100 across the site. I consider that this demonstrates that the site has very poor connectivity by walking."*

2.20 Although Mr Lewis' reported connectivity scores are not necessarily disputed, the conclusions drawn from them are overly simplistic and do not properly reflect either the purpose of the Connectivity Tool or its acknowledged limitations. Furthermore, the reported connectivity scores only reflect the baseline conditions only.

2.21 Additionally, Mr Lewis' evidence provides only selective connectivity score outputs. For clarity, I have undertaken my own analysis using the Beta Transport Connectivity Tool for the Appeal Site; the full output is provided at **Appendix MS4** and is summarised in Table 2.1.

Table 2.1 DfT Connectivity Tool Scores – Appeal Site (Existing / No Mitigation)

Type of Amenity	Mean Connectivity Score by Mode			
	Public Transport	Walking	Cycling	Overall Score
Education	22	5	24	13
Leisure	29	22	41	27
Health	28	11	32	21
Shopping	36	32	45	34
Workplaces	43	30	53	41
OVERALL	35	24	46	32

2.22 As detailed in Table 2.1, the Appeal Site achieves an existing overall mean connectivity score (excluding driving) of 32 and a mean walking connectivity score of 24; in line with the Mr Lewis' stated scores.

2.23 However, Table 2.1 also demonstrates varying levels of accessibility depending on the type of destination and mode of travel, with the Appeal Site performing materially better in relation to workplace accessibility and cycling connectivity than in relation to overall and walking accessibility. The outputs therefore demonstrate a varied accessibility profile, rather than uniformly "*poor*" or "*very poor*" connectivity as suggested by Mr Lewis.

2.24 Regardless, whilst the overall mean connectivity score may fall below the national average (see para. 2.6 regarding DfT's methodology), this is expected given the strategic scale and nature of the Appeal Site. It is both reasonable and inevitable that the Appeal Site would record lower relative connectivity scores than more centrally located settlements within the District, such as Haywards Heath or Burgess Hill.

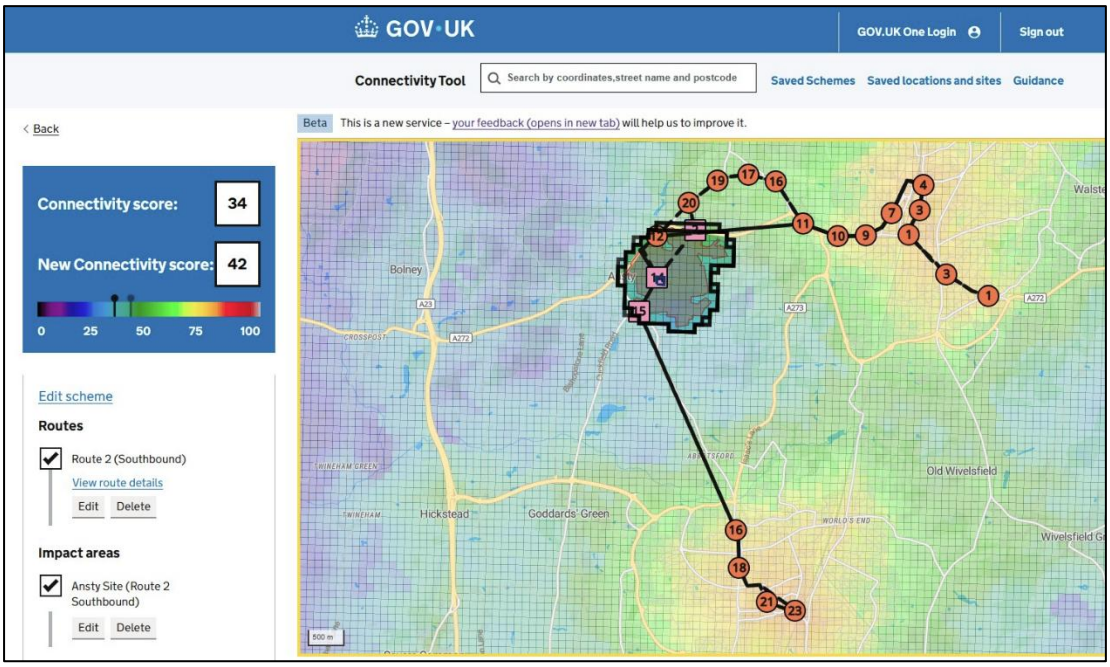
2.25 The DfT's published guidance acknowledges that the methodology inherently attributes higher connectivity values to locations proximate to urban centres, noting that *"…most value is located near urban centres…"* and that there are *"…clear 'hot spots' located near the centre…".*

2.26 In this context, a comparatively lower score does not indicate that a location is inaccessible or unsustainable. Rather, it reflects the strategic / relative nature of the metric. The Beta Transport Connectivity Tool is intended to provide context and must be considered alongside other evidence, including the detailed assessments already submitted by the Appellant.

2.27 Importantly, the connectivity scores relied upon by Mr Lewis reflect baseline conditions only, prior to the implementation of the comprehensive package of sustainable transport enhancements identified in Section 4 of my main evidence (CD8.4). At present, the Beta Connectivity Tool has only limited functionality to test the effects of proposed mitigation measures and, currently, only allows testing of revised or additional bus service provision.

2.28 Accordingly, an initial review has been undertaken to test the effect of the proposed bus service provision associated with the Appeal Site, as detailed in Section 4 of my main evidence (CD8.4). Figure 2.1 demonstrates that the proposed bus service provision would increase the public transport connectivity score at the proposed Local Centre from approximately 34 to 42, representing an uplift of around 25%.

Figure 2.1 DfT Connectivity Tool Output – Proposed Bus Service



2.29 The above provides only an initial example of how the proposed sustainable travel measures can materially improve accessibility outcomes over time. However, this assessment is limited by the current functionality of the Beta Connectivity Tool, which currently only allows testing of revised or additional bus service provision.

2.30 As such, I believe the above is an overly conservative assessment, as it does not account for the full package of sustainable travel enhancements detailed in Section 4 of my main evidence (CD8.4). Nor does it reflect the contribution of the proposed on-site facilities and mixed uses, including a primary school, SEND school, health hub incorporating a GP surgery, village centre comprising retail, employment and community uses, and sports and recreational facilities.

2.31 Collectively, the above enhancements, facilities, and uses would reduce the need to travel and support the internalisation of a proportion of development-related trips within the Appeal Site, thereby improving overall accessibility beyond that reflected in the baseline Beta DfT Connectivity Tool outputs detailed in Table 2.1.

2.32 In light of the above and in my professional opinion, Mr Lewis places undue reliance on selective baseline outputs from the Beta Connectivity Tool whilst failing to properly acknowledge both its intended purpose and its inherent limitations. That approach is inconsistent with published DfT guidance and the Draft NPPF, both of which make clear that the tool should be considered alongside wider site-specific evidence rather than treated as a determinative assessment of sustainability.

2.33 When considered alongside the Appellant's detailed transport evidence and the vision-led transport planning approach agreed at para. 4.3 of the HSCoG (CD7.2), the Appeal Site provides a comprehensive package of sustainable travel enhancements, as well as mixed-use local facilities, which would significantly enhance connectivity and accessibility opportunities for not only for future residents of the Appeal Site, but also for existing communities in Ansty, Cuckfield, Haywards Heath and Burgess Hill.

2.34 Accordingly, Mr Lewis' reliance on baseline Beta Connectivity Tool outputs alone does not provide a complete or balanced assessment of the Appeal Site's accessibility or sustainability credentials.

Sustainable Travel Routes

2.35 Section 4 of Mr Lewis' evidence (CD10.3), titled *"Pedestrian & Cycle Routes"* primarily focusses on access to Cuckfield village and Warden Park Academy via the existing PRoW network, specifically Footpath 8aCU, and selective routes.

2.36 However, and as set out within Section 4 of my main evidence (CD8.4), alternative routes exist via more formal, segregated, surfaced and, in most cases, lit routes along the A272 / B2036 South Street corridor for access to Cuckfield village, and via the A272 / B2184 Broad Street corridor for access to Warden Park Academy. Both corridors will benefit from a comprehensive package of sustainable travel enhancements as part of the Appeal Scheme, matters which are excluded from Mr Lewis' evidence.

2.37 Mr Lewis' evidence also places limited weight on the contribution of the proposed on-site facilities and mixed uses, including a primary school, SEND school, health hub incorporating a GP surgery, village centre comprising retail, employment and community uses, together with sports and recreational facilities. These uses would be served by an extensive internal walking and cycling network and would significantly reduce the need to travel by enabling a proportion of development-related trips to be internalised within the Appeal Site itself.

2.38 For those remaining external trips, para. 4.4 of the signed HSoCG (CD7.2) reveals that:

> *"Through the transport measures that form the vision adopted for the Appeal Site, it is interconnected with the existing residential populations of Ansty, Cuckfield and Haywards Heath by active travel modes (foot and cycle) and public transport (bus), and also with Burgess Hill by public transport (bus), thereby also offering an enhancement for existing residents."*

2.39 Whilst Mr Lewis' evidence considers only a limited selection of routes and existing baseline conditions, the following section of this rebuttal responds in detail to each of the specific route assessments presented within Section 4 of his evidence (CD10.3).

To Cuckfield / Warden Park Academy

2.40 Para. 4.2.1 of Mr Lewis' evidence (CD10.3) states that:

> *"…Warden Park Academy is a circa 2.8km or 40-minute walk from the application site. This is in excess of Manual for Streets (CD10.7) guidance for a walkable neighbourhood and in excess of the maximum walking distance recommended for being able to replace short car trips."*

2.41 However, Figure 4.3 of my main evidence (CD8.4) reveals that Warden Park Academy is within a comfortable cycling distance of approximately 3.2-kilometres from the centre of the Appeal Site.

2.42 As set out in Table 4.1 of my main evidence (CD8.4), the CIHT's Planning for Cycling (2014) (CD6.10), Homes England's Building for a Healthy Life (2020) (CD6.11), and Sustrans guidance identify strong potential for cycling to replace short car trips for journeys ranging <8.0-kilometres of new residential development.

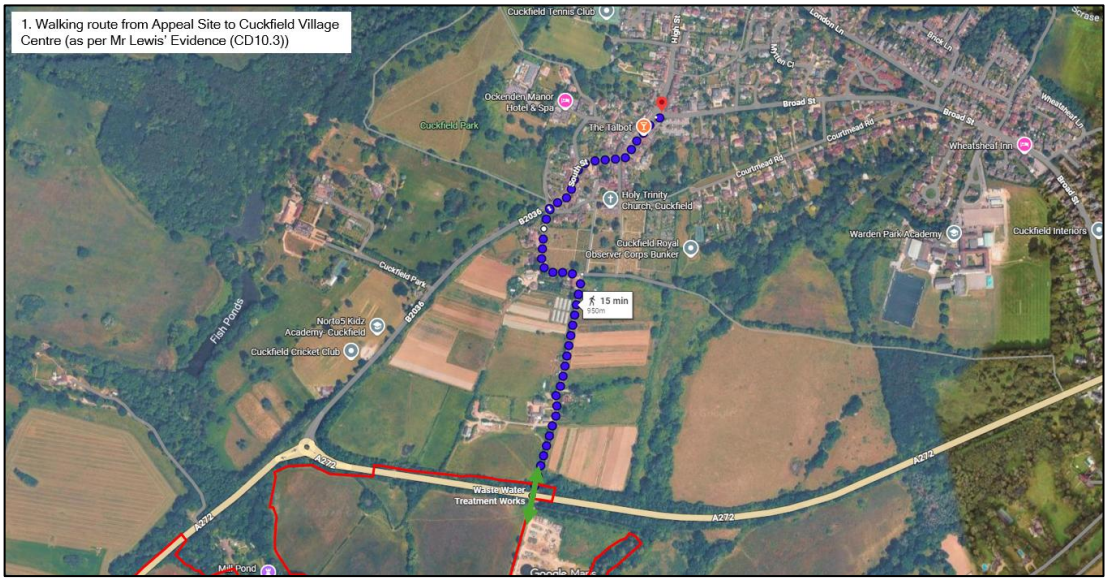
2.43 Accordingly, there is clear potential for cycling to substitute short car trips between the Appeal Site and Warden Park Academy, notwithstanding that Mr Lewis' assessment focuses almost exclusively on walking accessibility.

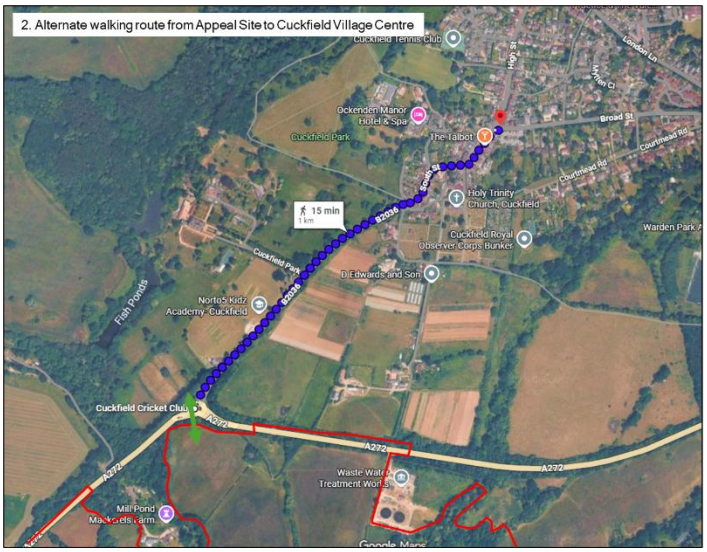
2.44 Within paras. 4.2.3 to 4.2.6 of his evidence (CD10.3), Mr Lewis states that the most direct route from the Appeal Site towards Cuckfield village, including Warden Park Academy, is via Footpath 8aCU, Newbury Lane, South Street (for Cuckfield Village), and Church Platt / PRoW CU22 (for Warden Park Academy). Mr Lewis contends that the proposed signal-controlled crossing of the A272 would direct a significant proportion of pedestrian and cycle movements onto this route and that Footpath 8aCU does not provide a complete connection to these destinations and therefore questions the suitability of the proposed walking and cycling connectivity.

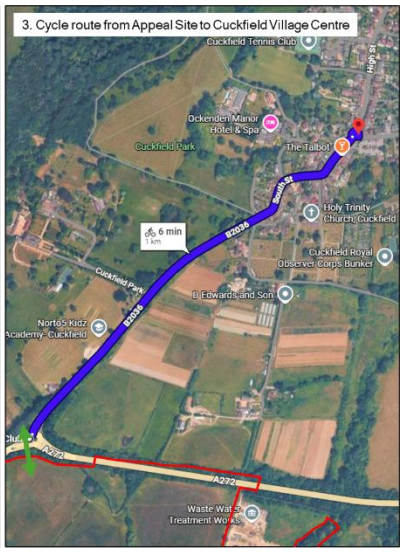
2.45 Firstly, it should be noted that Footpath 8aCU and the associated routes identified by Mr Lewis do not represent the sole, or indeed principal, walking and cycling connection between the Appeal Site and Cuckfield village or Warden Park Academy.

2.46 Figure 2.2 demonstrates that, based on a Google Maps route comparison (prior to the delivery comprehensive package of sustainable travel enhancements associated with the Appeal Site), the route identified by Mr Lewis would result in an approximate 15-minute walk to Cuckfield village centre from the nearest active travel access point to the Appeal Site.

Figure 2.2 Walking Routes – Appeal Site to Cuckfield Village Centre







2.47 However, Figure 2.2 also reveals that users could alternatively route through the Appeal Site and connect to the B2036 at the Appeal Site's northwesternmost active travel access point. Although, this alternate route increases travel distance by a negligible circa 50-metres, walk time remains at 15-minutes. Importantly, this route would be the main cycle route to Cuckfield Village centre, with a total cycle time of 6-minutes.

2.48 Whilst the ultimate route lengths and journey times will be influenced by the Appeal Site's internal layout, which will be determined through subsequent Reserved Matters applications, the comparison nevertheless demonstrates that the difference in route length and journey time between the two routes is negligible.

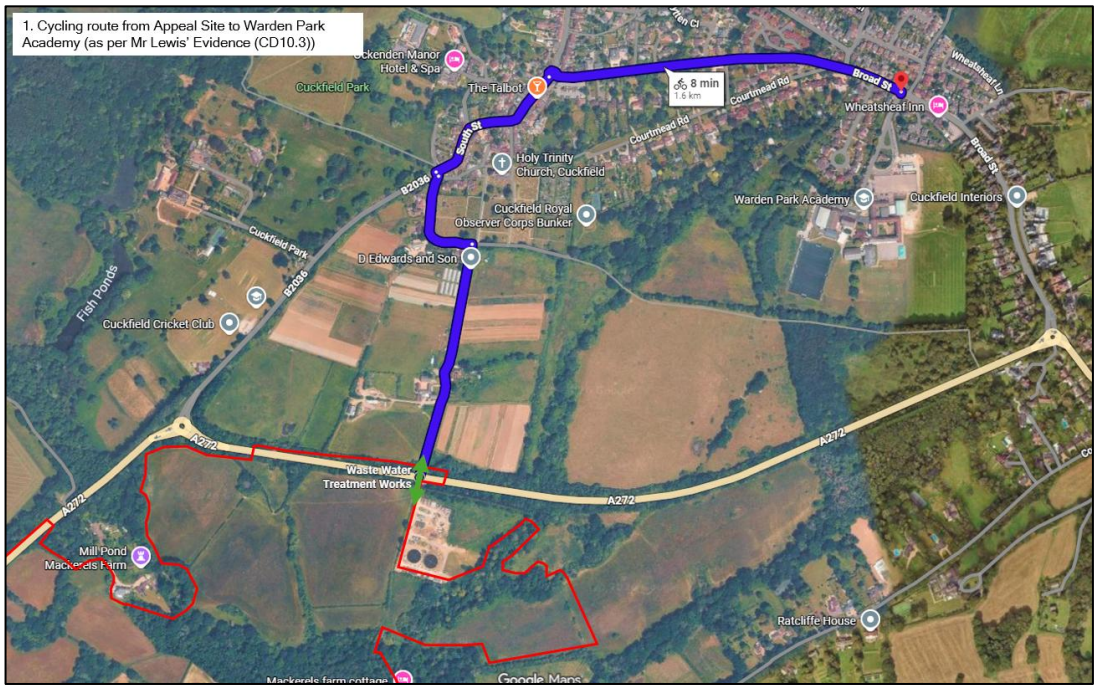
2.49 Para. 4.56 of my main evidence (CD8.4) confirms that, should the Inspector be minded to grant planning permission, the Appellant is committed to delivering the initial section of the Cycle Route Improvement Plan between the A272 / B2036 roundabout and the A272 / B2184 Broad Street roundabout prior to first occupation. These works include not only the provision of new crossing facilities on the A272 connecting Footpaths 8bCU and 8aCU, as referenced by Mr Lewis within his evidence (CD10.3), but also the delivery of a new 3.0-metre shared pedestrian and cycle facility along the southern side of the A272.

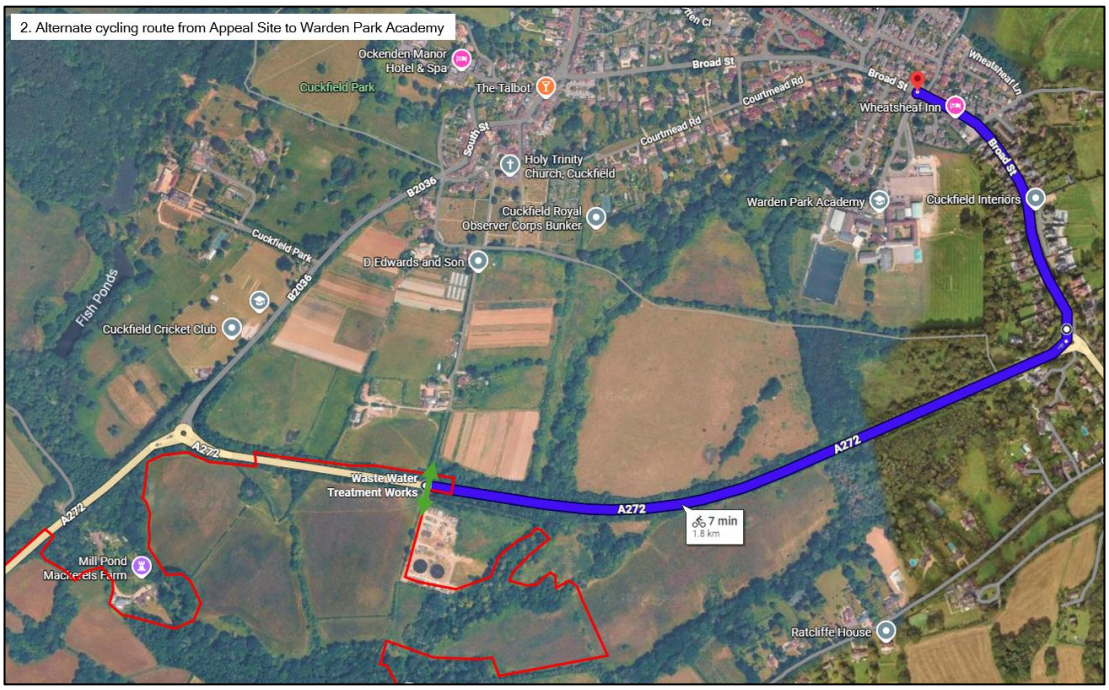
2.50 Accordingly, whilst the alternative walking route to Cuckfield village centre is marginally longer, it would provide future end-users with a fully sealed surfaced and more legible pedestrian connection, routing internally within the Appeal Site prior to continuing northwards along the western side of the B2036 towards Cuckfield village centre. It is envisaged that these measures would materially improve the attractiveness and usability of this alternative route for future end-users.

2.51 As such, and contrary to Mr Lewis' suggestion, future residents of the Appeal Site would benefit from multiple route options into Cuckfield village, including both the upgraded off-carriageway route associated with the Cycle Route Improvement Plan and the more informal route via Footpath 8aCU and Newbury Lane.

2.52 In respect of Warden Park Academy, Figure 2.3 reveals that the route identified by Mr Lewis in his evidence (CD10.3) measures approximately 1.6-kilometres from the nearest active travel access point (i.e. an 8-minute cycle).

Figure 2.3 Cycling Routes – Appeal Site to Warden Park Academy





2.53 Given that para. 3.1.5 of Mr Lewis' evidence (CD10.3) acknowledges that Warden Park Academy lies beyond the generally accepted 2.0-kilometre walking distance from the centre of the Appeal Site, albeit with some northern parts of the Appeal Site falling within 2.0-kilometres, it is unclear why his assessment focuses predominantly on pedestrian access via Footpath 8aCU, rather than assessing cycle access, which would represent the more realistic and attractive mode of active travel to Warden Park Academy.

2.54 As PRoW 8aCU is designated as a Footpath, cyclists travelling to Warden Park Academy from the Appeal Site would need to travel via an alternative route to that identified by Mr Lewis.

2.55 In this regard, Figure 2.3 demonstrates that cyclists travelling to Warden Park Academy could alternatively route east along the A272 before travelling north via the B2184 Broad Street. This alternative route would add only circa 200-metres to the overall journey distance and, owing to reduced gradients, would in fact reduce overall cycle journey time (according to Google Maps) by approximately 1-minute.

2.56 As previously mentioned, a 3.0-metre, lit, shared pedestrian and cycle facility would be delivered along the southern side of the A272 extending eastwards from the B2036 to the B2184 prior to first occupation of the Appeal Site. This route would be separated from the carriageway by a 2.5-metre verge, thereby providing a significantly more attractive, safe, and convenient route for future residents travelling towards Warden Park Academy and other destinations east of the Appeal Site.

2.57 Despite the suitable alternative routes identified above, and with limited regard given to the comprehensive package of sustainable travel enhancements associated with the Appeal Site, paras. 4.2.12 to 4.2.19 of Mr Lewis' evidence (CD10.3) focuses extensively on the existing conditions of Footpath 8aCU, notwithstanding that the signed HSoCG (CD7.2) which confirms that the route will be upgraded through future improvement works.

2.58 Notably Mr Lewis states the following:

- Para. 4.2.13 *"…no assessment has been undertaken to assess the interaction of vehicles, pedestrians and cyclists on this section of PRoW 8aCU. No surveys of vehicle activity or road safety audit have been undertaken and submitted with the application."*
- Para. 4.2.19 *"…No drawing is provided in any of the Appellants submission detailing the layout, width, dimensions, surface treatment or lighting that will be provided on this section of the route."*

2.59 However, paras. 4.14 to 4.16 of the signed HSoCG (CD7.2) confirm that the parties agree that Footpath 8aCU towards Cuckfield will be upgraded to WSCC specifications, including vegetation management on both sides of the footpath, to enhance connectivity to Warden Park Academy. Funding for these measures will be secured through the S106 Agreement. The detailed design, supporting surveys, and any necessary auditing would therefore be undertaken subsequently through the WSCC PRoW Team design and approval process.

2.60 For the purposes of this Appeal, the preceding sections of this rebuttal have demonstrated that the Appeal Site does not rely solely upon Footpath 8aCU, or the subsequent routes whose baseline conditions are assessed by Mr Lewis at paras. 4.2.20 to 4.2.36 of his evidence (CD10.3), to provide sustainable access to either Cuckfield village or Warden Park Academy.

2.61 Rather, the Appellant has identified a comprehensive package of complementary active travel measures that collectively provide a range of safe, convenient, and attractive route choices towards Cuckfield village and Warden Park Academy, consistent with the vision-led approach agreed with WSCC.

2.62 Notably, para. 4.2.38 of Mr Lewis' evidence (CD10.3) states that:

> *"In my view, the route between the Appeal Site and Cuckfield village centre and the Warren* [i.e. Warden] *Park Academy does not provide an appropriate route for pedestrians or cyclists, in particular school children or those with mobility needs.*

2.63 The preceding paragraphs of this rebuttal have demonstrated that Mr Lewis' conclusion gives insufficient regard to the comprehensive package of sustainable transport enhancements proposed as part of the Appeal Scheme and agreed with WSCC within the signed HSoCG (CD7.2).

2.64 Furthermore, Mr Lewis' assessment appears to consider active travel accessibility only, without acknowledging that future residents would benefit from a genuine choice of sustainable transport modes consistent with para. 110 of the NPPF. In this regard, para. 4.74 along with **Appendix MS3** of my main evidence (CD8.4) confirms that Warden Park Academy could be accessed in approximately 10-minutes from the Local Centre via proposed Bus Route 1, with passengers alighting at '*The Wheatsheaf*' bus stops located approximately 75 metres east of the Academy entrance on the B2184.

2.65 Accordingly, for future residents with mobility needs or who are not comfortable cycling to Warden Park Academy, an attractive and convenient public transport alternative would be available in addition to the aforementioned walking and cycling connections; which includes the alternative off-carriageway route via Footpath 8aCU which Mr Lewis focuses on.

2.66 The Appeal Scheme therefore provides future residents with a genuine choice of transport modes appropriate to differing journey purposes and user needs, consistent with paras. 110 and 117 of the NPPF and the vision-led approach agreed with WSCC within the signed HSoCG (CD7.2).

To Burgess Hill

2.67 Within paras. 4.3.1 to 4.3.8 of his evidence (CD10.3), Mr Lewis notes that that Burgess Hill represents a principal destination associated with the Appeal Scheme. Para. 4.3.2 states that *"The original Transport Assessment (CD1.50) supporting the planning application included options for delivering a pedestrian and cycle connection to Burgess Hill"*, with the subsequent paragraphs explaining that these connections are no longer proposed.

2.68 Whilst Burgess Hill is an important destination associated with the Appeal Site, Section 2 of the ACE Framework Travel Plan (December 2024) (CD2.36) confirms that the centre of the Appeal Site is located approximately 6.0-kilometres north of Burgess Hill. By comparison, the Appeal Site lies adjacent to Ansty, within walking and cycling distance of Cuckfield, and within a reasonable cycling distance of Haywards Heath, located approximately 4.0-kilometres to the east.

2.69 For context, my own analysis of the 2011 Census dataset *'WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)'*, attached at **Appendix MS5**, demonstrates that 6.1% of existing residents within the Mid Sussex 011 MSOA (in which the Appeal Site is located) commute to Burgess Hill for work. Of these, 0.8% (approximately 2 residents) travel by bicycle and 2.5% (approximately 6 residents) travel on foot.

2.70 Given that Burgess Hill lies beyond the reasonable cycling distances identified within Table 4.1 of my main evidence (CD8.4), and noting the limited proportion of existing active travel commuting trips to Burgess Hill, the Appellant has focused on delivering a comprehensive and vision-led package of active travel, public transport, and highway mitigation measures, consistent with para. 115(d) of the NPPF. These measures are detailed within my main evidence (CD8.4) and reflected throughout the agreed HSoCG with WSCC (CD7.2).

2.71 At para. 4.3.3 Mr Lewis states that:

> *"Given no pedestrian or cycle facilities are to be provided to connect to Burgess Hill, the only transport choices to connect from the Appeal Scheme will be via private car, or potentially by bus."*

2.72 However, as part of the comprehensive mitigation package, para. 4.67 of my main evidence (CD8.4) reveals that:

> *"The Bus Strategy package will deliver a minimum of a half-hourly service between the Appeal Site and Haywards Heath and a minimum of an hourly service between the Appeal Site and Burgess Hill during weekday daytime hours. It is fully expected that the Bus Strategy package will also deliver the same frequency of service on a Saturday as well as a minimum hourly service to both destinations during evening hours and on Sundays.*

2.73 Furthermore, para. 4.69 of my main evidence (CD8.4) confirms that the service will be operational prior to 30% occupation of the dwellings and that the Appellant will provide financial support to secure its operation for a minimum period of two years beyond final residential occupation of the Appeal Site.

2.74 In light of the above, whilst Section 5 of Mr Lewis' evidence (CD10.3) questions the long-term viability of the proposed bus service, I address this matter separately within Section 3 of this rebuttal. Nevertheless, at para. 4.3.8 Mr Lewis concludes that:

> *"Given that there is no pedestrian or cycle connection between the Appeal Scheme and Burgess Hill, which the Appellant has defined as one of the primary desire lines associated with the Appeal Scheme, it is evident that the Appeal Scheme does not provide a genuine choice of modes of travel for residents seeking to access Burgess Hill."*

2.75 Mr Lewis' suggestion that the Appeal Site fails to provide a *"…genuine choice of modes…"* because Burgess Hill is not directly connected by pedestrian and cycle infrastructure is overly narrow and inconsistent with both the NPPF and the transport vision for the Appeal Site.

2.76 The NPPF does not require all destinations to be accessible by every mode of travel, nor does it require direct pedestrian and cycle connectivity to all higher-order settlements irrespective of distance or context. Rather, genuine choice must be considered collectively across the internal and external transport network. In this regard, para. 4.4 of the signed HSoCG (CD7.2) confirms that:

> *"Through the transport measures that form the vision adopted for the Appeal Site, it is interconnected with the existing residential populations of Ansty, Cuckfield and Haywards Heath by active travel modes (foot and cycle) and public transport (bus), and also with Burgess Hill by public transport (bus), thereby also offering an enhancement for existing residents."*

To Haywards Heath & Train Station

2.77 Within para. 4.4.1 to 4.4.13 of his evidence (CD10.3), Mr Lewis considers the existing pedestrian and cycle connections between the Appeal Site and Haywards Heath, including the railway station, with particular reference to the route via Footpaths 69CR, Bridleway 67CR, and Copyhold Lane (a bridleway).

2.78 Para. 4.4.2 of Mr Lewis' evidence (CD10.3) further states that Haywards Heath town centre and railway station are located beyond the recommended walking distances and therefore considers it unlikely that future residents would walk between the Appeal Site and these destinations.

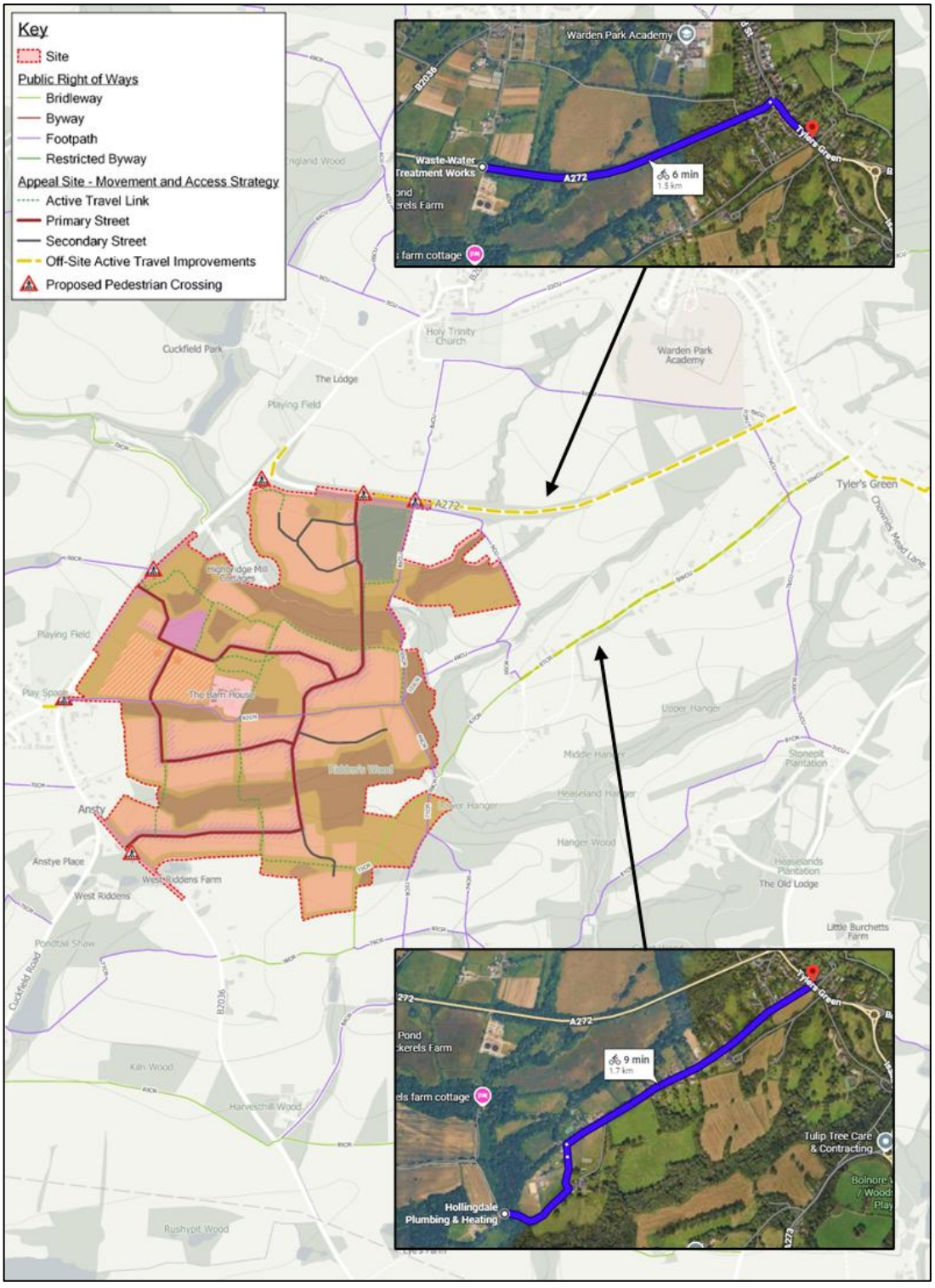
2.79 Notwithstanding this, Figure 4.3 of my main evidence (CD8.4) demonstrates that both Haywards Heath town centre and the railway station are within a reasonable cycling distance (i.e. <5.0-kilometres) from the centre of the Appeal Site.

2.80 As detailed in Table 4.1 of my main evidence (CD8.4), various national planning and design guidance documents identify strong potential for cycling to substitute short car trips for journeys of up to 8.0-kilometres associated with residential development. Accordingly, and notwithstanding Mr Lewis' focus on walking accessibility, there is clear potential for cycling to provide an attractive and realistic mode of travel between the Appeal Site and Haywards Heath town centre, including the railway station.

2.81 Mr Lewis continues, at para. 4.4.3 of his evidence (CD10.3), to identify the route via Copyhold Lane and Tylers Green as the "*…most direct walking and cycle route between the Appeal Scheme and Haywards Heath…"*. In contrast to his analysis of routes to Warden Park Academy, Mr Lewis acknowledges, within para. 4.4.3, the provision of the Appeal Scheme's proposed shared footway / cycleway along the southern side of the A272. However, he considers that this *"…would be a longer and more indirect route towards Haywards Heath, in particular for future residents at the southern end of the Appeal Scheme"*.

2.82 I believe Mr Lewis understates the importance of the A272 corridor. Figure 2.4 reveals the two routes mentioned by Mr Lewis, along with an overlay of the existing WSCC PRoW network, the Appeal Site's Movement and Access Strategy, and the Land Use Parameter Plan.

Figure 2.4 Active Travel Route – Appeal Site to Tylers Green



2.83 Figure 2.4 demonstrates that the *"…most direct walking and cycle route…"* via Copyhold Lane from the Appeal Site's easternmost access point measures approximately 1.7-kilometres and equates to a circa 9-minute cycle journey to its junction with Tylers Green. By comparison, the route via the A272 from the Appeal Site's northernmost access point measures approximately 1.5-kilometres and equates to a circa 6-minute cycle journey to the same point.

2.84 Whilst the ultimate route lengths and journey times will be influenced by the Appeal Site's internal layout, which will be determined through subsequent Reserved Matters applications, the comparison nevertheless demonstrates that the difference in route length and journey time between the two routes is negligible.

2.85 As such, it is reasonable to conclude that future residents would likely distribute across both routes depending on their location within the Appeal Site and ultimate destination. In this regard, the Appellant has focussed on proportionate improvements to both routes.

2.86 Both routes would also benefit from enhanced active travel infrastructure east towards Haywards Heath, as detailed in para. 4.37 of my main evidence (CD8.4):

> *"Continuing east towards Haywards Heath town centre and station additional works are proposed along the A272 Tylers Green to deliver priority crossings at side road junctions, a new signalised crossing at Crownes Mead Lane. A new 3.0m shared facility then continues on the northern side of the carriageway extending through the junction with Isaacs Lane and along the B2272 Butlers Green Road to the junctions with Bolnore Farm Road and Paddockhall Road."*

2.87 As such, the Appellant has identified a comprehensive package of active travel measures that collectively provide a range of safe, convenient, and attractive route choices towards Haywards Heath, consistent with the vision-led approach agreed with WSCC.

2.88 Within para. 4.4.12 of his evidence (CD10.3), Mr Lewis states that:

> *"No Drawings have been provided showing the proposed improvements to Footpath 69CR and no details of the layout, width, dimensions, surface treatment or lighting that will be provided on the route."*

2.89 As per the previously discussed improvements associated with Footpath 8aCU, Footpath 69CR will be upgraded to WSCC specifications, including vegetation management on both sides of the footpath, to enhance connectivity to Warden Park Academy. Funding for these measures will be secured through the S106 Agreement. The detailed design, supporting surveys, and any necessary auditing would therefore be undertaken subsequently through the WSCC PRoW Team design and approval process.

2.90 Whilst para. 4.4.13 of his evidence (CD10.3) continues:

> *"…It is evident that PRoW 67CR does not provide an appropriate route for pedestrians or cyclists to connect between the Appeal Scheme and wider pedestrian network, in particular for those with mobility needs."*

2.91 Mr Lewis' assessment again places disproportionate weight on the baseline condition of a single route, notwithstanding the alternative strategic route available via the A272 corridor and the wider package of active travel enhancements proposed as part of the Appeal Scheme.

2.92 Additionally, Mr Lewis considers active travel accessibility only, without acknowledging that future residents would benefit from a genuine choice of sustainable transport modes consistent with para. 110 of the NPPF. In this regard, paras. 4.68 to 4.71 along with **Appendix MS3** of my main evidence (CD8.4) confirms that Haywards Heath, along with the railway station, could be accessed in approximately 15-minutes from the Local Centre via proposed Bus Route 1.

2.93 Accordingly, for future residents with mobility needs or who are not comfortable cycling to Haywards Heath, an attractive and convenient public transport alternative would be available in addition to the aforementioned walking and cycling connections.

2.94 The Appeal Scheme therefore provides future residents with a genuine choice of transport modes appropriate to differing journey purposes and user needs, consistent with paras. 110 and 117 of the NPPF and the vision-led approach agreed with WSCC within the signed HSoCG (CD7.2).

Sustainable Travel Routes Summary

2.95 In summary, Section 4 of Mr Lewis' evidence (CD10.3) adopts an overly narrow approach by focusing solely on particular routes, modes, and baseline conditions, while giving insufficient regard to the comprehensive package of agreed active travel and public transport enhancements proposed as part of the Appeal Scheme.

2.96 As demonstrated throughout my main evidence (CD8.4) and this rebuttal, these enhancements would provide future residents with a genuine choice of sustainable transport modes and route options to a wide range of destinations including Ansty, Cuckfield, Haywards Heath, and Burgess Hill.

2.97 This position is reflected in the conclusions of the signed HSoCG (CD7.2), which confirms agreement between the Appellant and WSCC that, in accordance with paras. 109, 110 and 115(a) of the NPPF, the vision-led strategy and comprehensive package of measures ensure that the Appeal Site is sustainable, reduces the need to travel, and secures a genuine choice of transport modes.

3. Public Transport and Bus Service Viability

3.1 Section 5 of Mr Lewis' evidence (CD10.3) considers the accessibility of the Appeal Scheme by public transport, with a particular focus on the proposed bus service, assumptions relating to mode share, and the long-term viability of the proposed service.

3.2 The following section of this rebuttal will reveal Mr Lewis' assessment is overly pessimistic and fails to properly reflect the agreed strategy, the evidence base underpinning mode share assumptions (as agreed with WSCC), and the robust financial and operational framework intended to secure the long-term operation of the service.

Bus Routing

3.3 Para. 5.2.4 of Mr Lewis' evidence (CD10.3) states that:

> *"No details of the routeing, timetable or hours of operation of the bus routes is provided and the Bus Strategy Note (CD2.31) states that the "precise routing, timetable and frequency of the final bus provision for the development is subject to discussions with WSCC as well as the prospective bus operator for the scheme.""*

3.4 Paras. 5.2.5 and 5.2.6 of Mr Lewis' evidence (CD10.3) further suggest that the proposed services cannot be properly assessed in the absence of fixed routing commitments.

3.5 However, this does not reflect the full extent of the Bus Strategy Delivery Package set out in Section 4 of my main evidence (CD8.4). In particular, para. 4.65 confirms:

> *"The Appellant has collaborated extensively with WSCC, including their Public Transport team, as well as a local bus operator to agree a Bus Strategy package that secures regular frequency bus services connecting the Appeal Site with the main settlements and transport hubs of Haywards Heath and Burgess Hill, with connections locally in regard of improved services for Ansty and Cuckfield villages."*

3.6 The proposed routing and service provision are then set out in paras. 4.66 to 4.82, Figure 4.7, and **Appendix MS3** of my main evidence (CD8.4), which demonstrate a comprehensive and legible network of connections to key destinations, including higher-order services, employment, education, and transport hubs within Burgess Hill, Cuckfield, and Haywards Heath.

3.7 Importantly, the signed HSoCG (CD7.2) confirms that the Bus Strategy is agreed in principle. Paras. 4.33 to 4.35 confirm agreement that enhanced bus services will be delivered, with details of routing, frequency, funding, and commencement triggers secured via the S106 Agreement, alongside a direct contract with a WSCC-approved operator.

3.8 In my professional opinion, this approach is standard for strategic developments and ensures that the S106 secures the principle, service level, and delivery mechanism, while allowing detailed routing to be finalised in consultation with WSCC and the appointed operator to ensure operational efficiency.

3.9 As such, paras. 4.81 and 4.82 of my main evidence (CD8.4) remain relevant:

> *"The Appellant is committed through the Bus Strategy package, secured by the S106 Legal Agreement, to enter a direct contract with the bus operator, who is WSCC approved."*
>
> and
>
> *"The early delivery of the Bus Service Strategy aligns with the vision-led approach and meets the agreed objectives of influencing travel behaviour, reducing reliance on the private car and thereby realising modal shift targets. Throughout the phased development of the Appeal Site, these objectives will be continuously monitored through the Trip Monitoring Strategy."*

Bus Mode Share / Service Viability

3.10 Section 5.3 of Mr Lewis' evidence (CD10.3) disputes the public transport mode share assumptions relied upon by the Appellant in assessing the likely patronage and long-term viability of the proposed bus services.

3.11 Within paras. 5.3.5 to 5.39, Mr Lewis criticises the Appellant's use of 2021 Census journey to work data, stating unreliability due to the effects of the Covid-19 pandemic.

3.12 However, my own analysis of both the 2021 and 2011 Census *'QS701EW - Method of travel to work'* dataset, attached at **Appendix MS6**, reveals that bus mode share remained consistent, increasing by a negligible +0.1% between 2011 and 2021. As such, the evidence does not support the suggestion that the 2021 Census materially overstates bus usage.

3.13 At para's 5.3.18 – 5.3.23, Mr Lewis questions the application of 2023 prices for the operating costs related to the bus service provision.

3.14 For the avoidance of doubt, I have as part of preparing this rebuttal, requested updated operating costs from MCL based not only on 2026 prices but also on the updated service schedule that the Appellant is willing to implement and is agreed with WSCC. As noted in para's 4.67 – 4.69 of my main evidence (CD8.4) the updated service schedule comprises:

- Min. 30-min frequency to Haywards Heath (Route 1), Monday to Saturday daytime hours
- Min hourly frequency to Burgess Hill (Route 2), Monday to Saturday daytime hours
- Min. hourly frequency on both routes during evening hours and on Sundays

3.15 Based on the above, Table 3.1 summarises the updated operating costs. A copy of the correspondence from MCL is attached as **Appendix MS7**.

Table 3.1 Bus Service Operating Costs (updated – 2026 costs)

Route	No. Buses	Total Cost per annum	Cost per bus per annum
1 (to / from Haywards Heath via Cuckfield)	2	£482,269	£241,134
2 (to / from Burgess Hill & Haywards Heath)	1	£328,816	£328,816

3.16 Mr Lewis continues at Section 4 of his evidence to comment on the viability of the bus service, cross referencing the core document "Technical Transport Note #13 (Bus Strategy) (CD2.31). This document formed the basis upon which WSCC prepared their positive final consultation response to the planning application in July 2025 (CD4.10) in which it states (with my emphasis):

- *"The supporting costings provided directly to WSCC detail the bus services would be viable / break even at a 4.9% modal share once the development is fully built out (if based solely on trips from within the development). If a ten year build out period is utilised this would result in a total subsidy requirement of £2.132m to support the services. If a higher number of people were to use the bus services, then the level of support would be reduced by the additional fare box income.*
- *If the combined modal share for public transport is utilised (as the bus service will need to connect with the railway station in Haywards Heath) then the west of Haywards Heath would indicate a potential model share of 7.5% and 7.9% for the MSOA of Cuckfield and Ansty.*

- *The provision of the proposed service in conjunction with the mobility hubs, the proposed internal design that promotes public transport permeability, provision of travel plan and trip monitoring strategy as well as the early provision of the services to embed sustainable transport habits would provide an opportunity for the service to be successful.*

3.17 From the above feedback in the WSCC July 2025 Consultation Response (CD4.10), it is evident that Mr Lewis, in analysing the viability of the bus service in Section 5.5 of his evidence, has assumed that the current, static rural hinterland baseline travel habits will not change as a consequence of the transformational nature of the emerging Appeal Site proposals.

3.18 Further, Mr Lewis has taken no account of the delivery mechanisms that are to be secured by way of a signed legal agreement between parties that comprehensively covers the implementation of the bus service along with the time period over which the service will be supported, i.e. the full occupation of the proposed development plus two years.

3.19 Mr Lewis has also misunderstood the bus mode share potential of the Appeal Site, that as noted in the WSCC Consultation Response (CD 4.10), could reach 7.5% - 7.9% with the bus service acting as a means of access (secondary mode) to rail services (primary mode) from both Haywards Heath and Burgess Hill stations.

3.20 Mr Lewis also asserts that the current £3 capped fare will remain in perpetuity beyond the March 2027 end date announced by the Chancellor in June 2025.

3.21 The Office of Budget Responsibility ("OBR") has indicated that once the £3 capped fare expires in March 2027, fare inflation is expected to rise sharply to catch up with suppressed operating costs (such as fuel, wages, and maintenance). On this basis, the OBR indicates that commercial operators are likely to increase fares at or above the Retail Price Index (RPI), resulting in potential year-on-year increases in the 4% to 6% range.

3.22 Based on the above, and the updated operating costs that have been provided, I have therefore updated the assessment of commercial viability for the bus service, a copy of which is included as **Appendix MS8**.

3.23 Within the updated commercial viability assessment, the following is noted:

- The no. of occupations, at 150 dwellings per annum, is consistent with the previous assessment, as agreed with WSCC.

- Recognising that any increased bus mode share takes time to realise from the introduction of a service, I have assumed a 1.7% starting mode share, consistent with Mr Lewis's analysis of Census Data, rising at a rate of 0.8% per annum to take account of embedded sustainable travel habits, travel plan measures and trip monitoring strategy to 7.9%.

- Operating days have increased from 260 to 312 per annum to reflect the inclusion of a Saturday service, No account has been taken of the Sunday service for robustness.

- The inflationary figures applied to both fares and operating costs are consistent with the figures previously agreed with WSCC and are based on Office for National Statistics figures.

3.24 On this basis, the calculations provided in **Appendix MS8** compellingly demonstrate that by Year 9 of the development build-out on the Appeal Site, the bus service will be commercially viable, confirming the statement I made within paragraph 4.87 of my main proof of evidence (CD4.8).

3.25 Furthermore, the Appellant is committed to ensuring that the bus service is fully supported until Year 10+2, allowing for a significant degree of headroom in the assumptions made within the updated commercial viability assessment.

3.26 In addition, the trip monitoring strategy agreed with WSCC, makes provision for additional founding to be made available in support of sustainable transport measures in the event that predicted mode share values are not met. This provides a further safety net, even though based on the updated commercial viability assessment it is high unlikely this will ever be needed.

4. Genuine Choice of Travel Modes

4.1 Para. 6.1.7 of Mr Lewis' evidence (CD10.3) states that:

> *"In conclusion, the Appeal Scheme is not in a sustainable location, and the Appellant has not demonstrated that the Appeal Scheme can be made sustainable. Furthermore, the Appeal Scheme does not provide a genuine choice of transport mode for future site users. On that basis, I am of the professional view that this Appeal should be dismissed."*

4.2 In reaching the above conclusion, and as detailed elsewhere within this rebuttal, Mr Lewis adopts an overly narrow approach by focusing solely on particular routes, modes, and baseline conditions, while giving insufficient regard to the comprehensive package of agreed active travel and public transport enhancements proposed as part of the Appeal Scheme.

4.3 As referenced in Section 2 of my evidence, MSDC have confirmed in para. 2.14 of the Officer's Report to Committee (CD3.1) that the Appeal Site proposals incorporate *"…appropriate opportunities to promote sustainable transport…"*. MSDC reached this conclusion based on the statutory consultation responses received from WSCC Highways Development Management Team, WSCC PRoW Team, ATE and NH.

4.4 This is further reinforced by the agreed position of the Appellant and WSCC set out within para. 6.1 of the HSoCG (CD7.2) which states, with my emphasis underlined:

> *"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."*

4.5 The comprehensive package of interventions referenced in para 6.1 of the HSoCG (CD7.2), as fully agreed with WSCC, includes but no limited to (see para. 4.48 of my main evidence for the full summary):

- An extensive network of off-carriageway commuter and leisure routes within the Appeal Site;
- Pedestrian / cycle crossings at key off-site locations to secure means of connection with existing infrastructure;
- The provision of a network of Mobility Hubs with sustainable travel facilities to include cycle storage / stands, cycle repair area, E-scooter storage / charging area, covered seating, information / wayfinding signage, bus stop shelter / flag / timetable, car club parking, electric vehicle charging / disabled parking, street lighting and LTN1/20 parallel crossing points;

- Pedestrian and cycle route improvements to Haywards Heath and at the B2036 London Road / Ardingly Road mini-roundabout; and
- Upgrades to Public Rights of Way ("PRoW") to include works to Footpath 62CR to Bridleway specification and improved surfacing on Bridleway 67CR / 50bCU.

4.6 The above is in addition to the enhanced public transport provision in line with the Bus Strategy agreed with WSCC that secures a direct contract with an approved bus operator for a minimum period of up to two years post final residential occupation of the development, delivering a half-hourly service between the Appeal Site and Haywards Heath as well as an hourly service between the Appeal Site and Burgess Hill during Monday - Saturday daytime hours, as well as an hourly service to both destinations during evening hours and on Sundays.

4.7 In this regard, and as detailed in para. 4.4 of the signed HSoCG (CD7.2):

> *"Through the transport measures that form the vision adopted for the Appeal Site, it is interconnected with the existing residential populations of Ansty, Cuckfield and Haywards Heath by active travel modes (foot and cycle) and public transport (bus), and also with Burgess Hill by public transport (bus), thereby also offering an enhancement for existing residents."*

4.8 The HSoCG (CD7.2) further confirms that the Appeal Scheme incorporates Travel Plan measures and a Trip Monitoring Strategy specifically intended to reduce reliance on the private car and encourage sustainable travel behaviour over the lifetime of the development.

4.9 In my opinion, and consistent with the signed HSoCG (CD7.2), the Appeal Scheme delivers a comprehensive and policy-compliant package of sustainable transport infrastructure and measures that would provide future residents with realistic and attractive alternatives to private car use, whilst also delivering wider connectivity benefits for existing local residents.

4.10 Accordingly, and having regard to the agreed position set out within the signed HSoCG (CD7.2), I consider that the requirements of para. 110 of the NPPF are clearly met in that the Appeal Site represents a sustainable location that offers a genuine choice of transport modes.

5. Conclusions

5.1 Within this rebuttal I have addressed and responded to the evidence submitted by Mr Lewis regarding the accessibility and sustainability credentials of the Appeal Site.

5.2 The rebuttal does not seek to respond to every point raised by Mr Lewis. Rather, it focuses on those issues where clarification is required, where there is a material difference in professional interpretation, or where new emphasis has been introduced since submission of my main evidence (CD8.4).

5.3 The collective measures proposed in connection with the Appeal Site, as fully set out in the signed HSoCG (CD7.2), for which no matters remain in dispute between the Appellant and WSCC, maximise opportunities to reduce the need to travel, particularly by private car.

5.4 As such and in overall conclusion, and specifically in relation to accessibility and sustainable transport matters, the Appeal Site proposals have been shown within my evidence to fully accord with paras. 110, 115 and 116 of the NPPF.

5.5 In particular, I believe that the requirements of para. 110 of the NPPF are met comprehensively in that the Appeal Site is sustainable and offers a genuine choice of transport modes recognising that sustainable transport solutions very between urban and rural areas.

5.6 In the context of part d) of para. 115, I have demonstrated that the mitigation that supports the Appeal Site proposals is vision-led and prioritises enhancement to the active travel and public transport networks to the benefit of the wider community and to deliver choice to future prospective residents in travel mode when accessing the full range of facilities and services, reducing reliance on the use of the car.

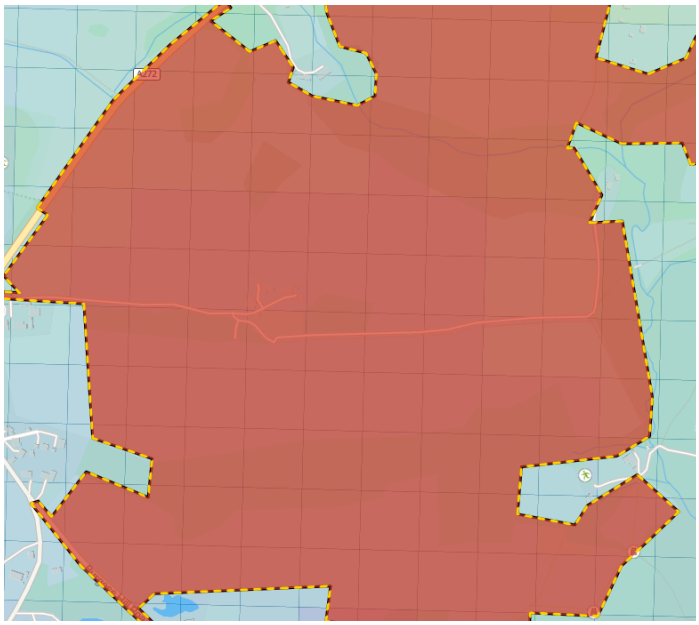
5.7 Equally, under the requirements of para. 116 of the NPPF, it is my expert opinion that the proposed means of access to the Appeal Site will not lead to an unacceptable impact on highway safety and that any residual impact on the wider network as a result of the proposed mitigation, taking into account all reasonable future scenarios, will not be severe.

5.8 I therefore respectfully request that the Inspector allows this Appeal.

Appendix MS4

Explore site

Site name	1
Size	1016711.00 m | 101.67 Ha



Overall

Mode of transport	Mean	Maximum	Minimum
Overall (Except driving)	32	43	24
Public transport	35	45	27
Walking	24	37	14
Cycling	46	55	36
Driving	71	85	51

Education

Mode of transport	Mean	Maximum	Minimum
Overall (Except driving)	13	22	8
Public transport	22	33	15
Walking	5	13	1
Cycling	24	36	10

Mode of transport	Mean	Maximum	Minimum
Driving	52	74	23

Leisure

Mode of transport	Mean	Maximum	Minimum
Overall (Except driving)	27	37	20
Public transport	29	38	23
Walking	22	33	12
Cycling	41	53	23
Driving	65	82	39

Health

Mode of transport	Mean	Maximum	Minimum
Overall (Except driving)	21	36	11
Public transport	28	42	16
Walking	11	26	3
Cycling	32	51	14
Driving	60	79	35

Shopping

Mode of transport	Mean	Maximum	Minimum
Overall (Except driving)	34	54	18
Public transport	36	52	21
Walking	32	54	13
Cycling	45	67	26
Driving	72	92	43

Residential

Mode of transport	Mean	Maximum	Minimum
Overall (Except driving)	46	52	40
Public transport	44	50	39
Walking	44	52	37
Cycling	60	63	55
Driving	83	86	78

Workplaces

Mode of transport	Mean	Maximum	Minimum
Overall (Except driving)	41	47	37
Public transport	43	48	37
Walking	30	36	24
Cycling	53	55	48
Driving	74	78	70

Appendix MS5

WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)

population	All usual residents aged 16 and over in employment the week before the census
units	Persons
date	2011
method of travel to work	All categories: Method of travel to work (2001 specification)

	usual residence		
place of work	**E02006614 : Mid Sussex 011**		
E02006604 : Mid Sussex 001	51	1.3%	
E02006605 : Mid Sussex 002	17	0.4%	
E02006606 : Mid Sussex 003	11	0.3%	
E02006607 : Mid Sussex 004	15	0.4%	
E02006608 : Mid Sussex 005	4	0.1%	
E02006609 : Mid Sussex 006	106	2.7%	
E02006610 : Mid Sussex 007	74	1.9%	
E02006611 : Mid Sussex 008	120	3.1%	
E02006612 : Mid Sussex 009	637	16.3%	
E02006613 : Mid Sussex 010	91	2.3%	
E02006614 : Mid Sussex 011	370	9.5%	
E02006615 : Mid Sussex 012	32		
E02006616 : Mid Sussex 013	11	6.1%	Burgess Hill MSOAs
E02006617 : Mid Sussex 014	137		
E02006618 : Mid Sussex 015	60		
E02006619 : Mid Sussex 016	69	1.8%	
E02006620 : Mid Sussex 017	20	0.5%	
Adur	24	0.6%	
Arun	7	0.2%	
Ashford	0	0.0%	
Aylesbury Vale	0	0.0%	
Basingstoke and Deane	0	0.0%	
Bracknell Forest	3	0.1%	
Brighton and Hove	218	5.6%	
Canterbury	0	0.0%	
Cherwell	0	0.0%	
Chichester	8	0.2%	
Chiltern	0	0.0%	
Crawley	407	10.4%	
Dartford	2	0.1%	
Dover	0	0.0%	
East Hampshire	1	0.0%	
Eastbourne	6	0.2%	
Eastleigh	3	0.1%	
Elmbridge	6	0.2%	
Epsom and Ewell	7	0.2%	
Fareham	1	0.0%	
Gosport	0	0.0%	
Gravesham	0	0.0%	
Guildford	13	0.3%	
Hart	0	0.0%	
Hastings	1	0.0%	
Havant	0	0.0%	
Horsham	116	3.0%	
Isle of Wight	0	0.0%	
Lewes	145	3.7%	
Maidstone	3	0.1%	
Medway	2	0.1%	
Milton Keynes	1	0.0%	
Mole Valley	20	0.5%	
New Forest	1	0.0%	
Oxford	0	0.0%	
Portsmouth	2	0.1%	
Reading	3	0.1%	
Reigate and Banstead	74	1.9%	
Rother	0	0.0%	
Runnymede	7	0.2%	
Rushmoor	3	0.1%	
Sevenoaks	6	0.2%	
Shepway	0	0.0%	
Slough	2	0.1%	
South Bucks	0	0.0%	
South Oxfordshire	1	0.0%	
Southampton	0	0.0%	
Spelthorne	2	0.1%	
Surrey Heath	0	0.0%	
Swale	1	0.0%	
Tandridge	35	0.9%	
Test Valley	0	0.0%	
Thanet	0	0.0%	
Tonbridge and Malling	8	0.2%	
Tunbridge Wells	10	0.3%	
Vale of White Horse	0	0.0%	
Waverley	4	0.1%	
Wealden	71	1.8%	
West Berkshire	2	0.1%	
West Oxfordshire	1	0.0%	
Winchester	0	0.0%	
Windsor and Maidenhead	3	0.1%	
Woking	1	0.0%	
Wokingham	2	0.1%	
Worthing	23	0.6%	
Wycombe	1	0.0%	
East	24	0.6%	
East Midlands	1	0.0%	
London	772	19.7%	
North East	1	0.0%	
North West	6	0.2%	
Northern Ireland	0	0.0%	
Scotland	6	0.2%	
South West	12	0.3%	
Wales	3	0.1%	
West Midlands	6	0.2%	
Yorkshire and The Humber	2	0.1%	
TOTAL	**3,915**	**100%**	

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)

population	All usual residents aged 16 and over in employment the week before the census
units	Persons
date	2011
usual residence	E02006614 : Mid Sussex 011 (2011 super output area - middle layer)

	place of work					
Method of travel to work	**E02006615 : Mid Sussex 012**	**E02006616 : Mid Sussex 013**	**E02006617 : Mid Sussex 014**	**E02006618 : Mid Sussex 015**	**TOTAL**	**%**
Driving a car or van	25	10	99	51	185	77.1%
Passenger in a car or van	4	1	8	6	19	7.9%
Underground, metro, light rail o	0	0	0	0	0	0.0%
Train	1	0	12	0	13	5.4%
Bus, minibus or coach	2	0	6	0	8	3.3%
Taxi	0	0	4	1	5	2.1%
Motorcycle, scooter or moped	0	0	1	1	2	0.8%
Bicycle	0	0	2	0	2	0.8%
On foot	0	0	5	1	6	2.5%
TOTAL	**32**	**11**	**137**	**60**	**240**	**100%**
Work mainly at or from home	0	0	0	0		
Other method of travel to work	0	0	0	0		

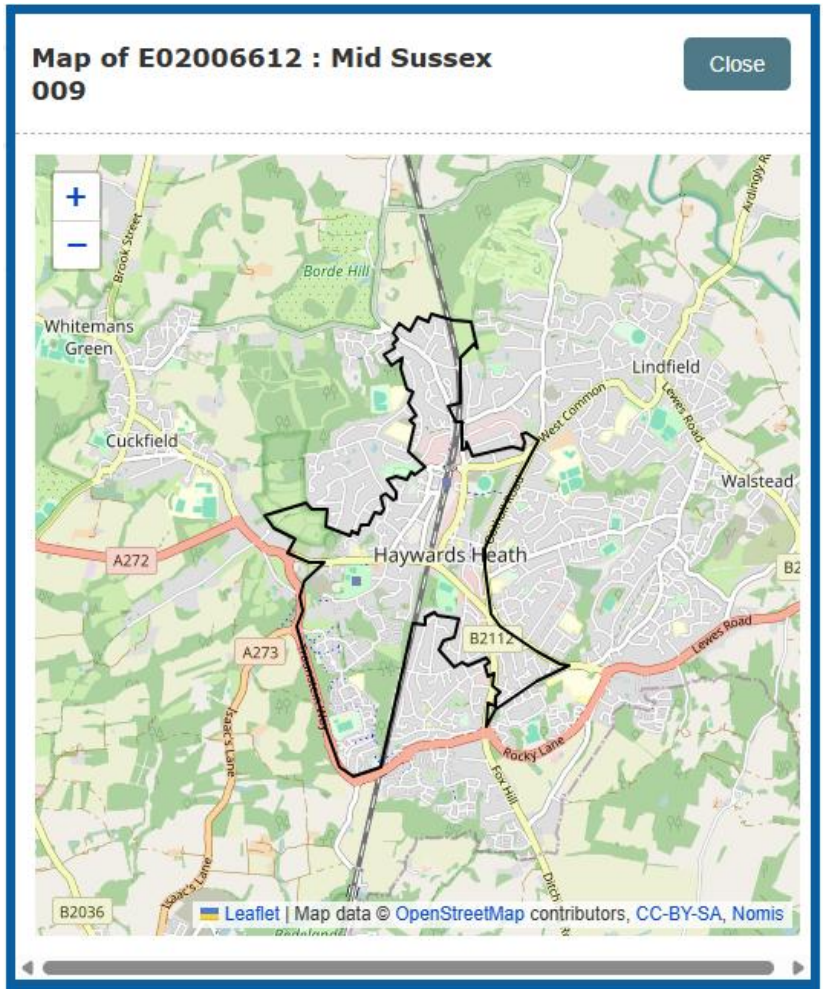
In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

Appendix MS6

QS701EW - Method of travel to work

population	All usual residents aged 16 to 74
units	Persons
area type	2011 super output areas - middle layer
area name	E02006612 : Mid Sussex 009
rural urban	Total

Method of Travel to Work	2011		2021		Diff 2021 vs 2011
Underground, metro, light ra	15	0.3%	13	0.4%	0.1%
Train	1,286	23.9%	350	10.1%	-13.8%
Bus, minibus or coach	90	1.7%	61	1.8%	0.1%
Taxi	32	0.6%	23	0.7%	0.1%
Motorcycle, scooter or mope	34	0.6%	23	0.7%	0.0%
Driving a car or van	2,759	51.3%	2,100	60.5%	9.2%
Passenger in a car or van	168	3.1%	159	4.6%	1.5%
Bicycle	52	1.0%	31	0.9%	-0.1%
On foot	911	16.9%	666	19.2%	2.2%
Other method of travel to w	29	0.5%	46	1.3%	0.8%
	5,376	100.0%	3,472	100.0%	0.0%



Appendix MS7

Outlook

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

From Kevin Hawkins <kevin@martlet.uk.com>
Date Tue 19/05/2026 12:16
To Matt Stevens <mstevens@milestonetp.co.uk>

Hi Matt,

Further to our call yesterday, I have recosted the proposed service which now reflects:

An earlier trip introduced on route 1.
An earlier trip and the Evening and Sunday services added to route 2.
Updated operating costs since 2023, including the April 2026 fuel price.
This results in the following:

Route	Buses	Total per annum	Per bus per annum
1	2	£482,269	£241,134
2	1	£328,816	£328,816

I hope this is what you need.

Best Regards

Kevin

Kevin Hawkins
Commercial Director
MCL Transport Consultants Ltd

Please note that my normal working days are Mondays to Thursdays

Office: 01323 872909
Mobile: 07736 164908
Switchboard: 01323 872900
Website: www.mcl-transport.co.uk
Address: MCL, Barclays Bank Chambers, Broad Street, Seaford, East Sussex, BN25 1NG

Appendix MS8

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

Bus Service Commercial Viability Assessment

26.05.2026

Year		No. Occupations	No. Daily Trips	Bus Mode Share	No. Bus Trips Per Day	No. Bus Trips Per Annum (Note 1)	Fare (Note 2)	Annual Revenue	Operating Cost (Note 3)			Commercial Profile
									HH	BH	Combined	
1	2027	150	1344	0.017	23	7129	£3.00	£21,385.73	£491,914.38		£491,914.38	-£470,528.65
2	2028	300	2688	0.025	67	20966	£3.06	£64,157.18	£501,752.67		£501,752.67	-£437,595.48
3	2029	450	4032	0.033	133	41513	£3.12	£129,571.85	£511,787.72	£348,942.16	£860,729.88	-£731,158.03
4	2030	600	5376	0.041	220	68770	£3.18	£218,937.16	£522,023.48	£355,921.00	£877,944.48	-£659,007.32
5	2031	750	6721	0.049	329	102751	£3.25	£333,661.82	£532,463.94	£363,039.42	£895,503.37	-£561,841.55
6	2032	900	8065	0.057	460	143428	£3.31	£475,068.17	£543,113.22	£370,300.21	£913,413.44	-£438,345.26
7	2033	1050	9409	0.065	612	190815	£3.38	£644,664.42	£553,975.49	£377,706.22	£931,681.70	-£287,017.28
8	2034	1200	10753	0.073	785	244910	£3.45	£843,974.95	£565,055.00	£385,260.34	£950,315.34	-£106,340.39
9	2035	1350	12097	0.079	956	298167	£3.51	£1,048,049.98	£576,356.10	£392,965.55	£969,321.65	£78,728.34
10	2036	1450	12993	0.079	1026	320251	£3.59	£1,148,190.43	£587,883.22	£400,824.86	£988,708.08	£159,482.36
10+1	2037	1450	12993	0.079	1026	320251	£3.66	£1,171,154.24	£599,640.88	£408,841.36	£1,008,482.24	£162,672.00
10+2	2038	1450	12993	0.079	1026	320251	£3.73	£1,194,577.33	£611,633.70	£417,018.18	£1,028,651.88	£165,925.44

Notes:

1 Assumes 312 operating days, i.e. Monday - Saturday as per Para. 4.67 of MS Proof of Evidence (CD8.4) - robust as it excludes any revenue from Sunday service

2 Assumes 2.0% inflation per annum (Source: Office of National Statistics)

3 HH - Haywards Heath Service at 30-min frequency, Monday to Saturday (incl. early morning & evening service provision)

BH - Burgess Hill Service at hourly frequency, Monday - Saturday (incl. early morning & evening service provision)

Based on updated cost per annum as provided by MCL based on updated service provision as outlined in Paras. 4.67 - 4.69 of MS Proof of Evidence (CD 8.4)

with HH service introduced prior to occupation of 50 dwellings anfd BH service introduced at 30% occupation