

TECHNICAL NOTE			VELOCITY		
Client	Ansty & Staplefield Parish Council And Cuckfield Parish Council		Page No.	1 of 4	
Project	Land East of Ansty		Project No.	22-163	
Subject	Rebuttal Note		Document No	RN01	
Prepared By	DL	Checked and Authorised By	DL	Date	June 2026

1 REBUTTAL NOTE

1.1 INTRODUCTION

- 1.1.1 This Rebuttal Note has been provided following additional evidence provided by Mr Stevens in his Rebuttal Evidence dated May 2026 (**CD8.8**).
- 1.1.2 In Mr Steven's Rebuttal Evidence he has provided updated information on the expected cost of operating the proposed bus services associated with the Appeal Scheme and additional commitments with respect of the operating days of the bus services.
- 1.1.3 This Rebuttal Note provides an update to the bus service viability analysis presented in my Proof of Evidence (**CD10.3**) to reflect the new information provided by Mr Stevens on bus services costs and operating days.

1.2 ADDITIONAL BUS SERVICE INFORMATION

UPDATED BUS SERVICES COSTS

- 1.2.1 In his Rebuttal Evidence (**CD8.8**), Mr Stevens provides updated cost estimates for operating the bus services proposed to be associated with the Appeal Scheme. These are presented in Table 3.1 of Mr Stevens' Rebuttal Evidence (**CD8.8**) and show the followings costs based on 2026 prices:
- ⊙ Bus Route 1 - £482,269 per annum
 - ⊙ Bus Route 2 - £328,816 per annum
 - ⊙ **Total - £811,085 per annum.**
- 1.2.2 Mr Stevens also provides new analysis of the future cost of the bus service based on the expected increase in the costs of the bus services in line with inflation. Those costs are shown in Appendix MS8 of Mr Stevens Rebuttal and shows that the expected cost of operating the bus services in Year 10 + 2 after commencement of the development (estimated to be 3038) will be as follows:
- ⊙ Bus Route 1 - £611,633.70 per annum
 - ⊙ Bus Route 2 - £417,018.18 per annum
 - ⊙ **Total - £1,028,651.88 per annum.**
- 1.2.3 In summary Mr Stevens now estimates that the proposed bus services will cost £1,028,651.88 per annum to operate in Year 10+2 after commencement of the development.

UPDATED BUS OPERATING DAYS

- 1.2.4 An updated draft S106 agreement (**CD19.3**) has now been submitted to the Planning Inquiry and this includes an obligation for the bus services to operate on a Saturday, in addition to weekdays.



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1.2.5 The bus viability analysis presented at Appendix MS8 of Mr Stevens’ Rebuttal (**CD8.8**) includes an assessment of bus revenue that would be collected on a Saturday, with assessment of the bus service operating on 312 days per year.

1.3 UPDATED VIABILITY ANALYSIS

1.3.1 Based on the updated bus service cost and updated operational days set out in Mr Stevens’ Rebuttal (**CD8.8**), I have updated my own viability analysis which I presented in my Proof of Evidence (**CD10.3**)

1.3.2 As set out in my Proof of Evidence, I consider that a bus mode share of 2% is realistic for the Appeal Scheme. **TABLE 1.2** below provides my updated bus service viability analysis. Information on daily trips, bus service operating costs, operating days and ticket prices have been based on the information provided by Appellant. The only factor I have not taken from the Appellants assumptions is the bus mode share which is based on the analysis presented at Section 5.3 of my Proof of Evidence.

		SOURCE
Daily Trips (All Modes)	12,993	Mr Steven Rebuttal Appendix MS8
Bus Mode Share	2%	Analysis presented at Section 5.3 of my Evidence
Daily Bus Trips	260	Daily Trips x Bus Mode Share
Bus Fare	£3.73 (In Year 10 +2)	Mr Steven Rebuttal Appendix MS8
Revenue Per Day	£969.80	Daily Trips x Bus Fare
Operating Weekday Per Year	312	Mr Steven Rebuttal Appendix MS8
Revenue Per Year	£302,577.60	Revenue Per Day x Operating Days Per Year
Operating Costs Per Year	£1,028,651.88 (In Year 10 +2)	Mr Steven Rebuttal Appendix MS8
Operating Loss Per Year	£726,074.28	Revenue Per Year minus Operating Costs Per Year

1.3.3 The above analysis demonstrates that the bus services will operate with a loss of £786,074.28 per annum.

1.3.4 This is a worse situation than the information presented within my Proof of Evidence which concluded that the bus services would operate with a loss of £482,892 per annum.

1.3.5 I would highlight that the only changes to my bus service viability analysis, from that presented in my Proof of Evidence, are to reflect updated information provided by Mr Stevens in his Rebuttal Proof of Evidence regarding bus service operating costs, ticket prices and operating days on which my analysis is now consistent with Mr Stevens.



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- 1.3.6 The viability analysis presented above (consistent with analysis presented in Mr Steven’s Rebuttal) assumes that all bus users will pay a full fare price for their journey. As set out in my Proof of Evidence, information provided by WSCC in their Bus Service Improvement Plan (CD10.11) shows that 30% of bus passengers in the County are older or disabled bus passengers who are eligible for concessionary fares. In addition, school children and younger people are also eligible for concessionary fares.
- 1.3.7 Given that the analysis above, and that presented by Mr Stevens, does not make allowance for concessionary fares, the analysis will therefore overestimate revenue from the bus services.
- 1.3.8 As detailed in my Proof of Evidence, the WSCC Consultation response dated 9th July 2025 (**CD4.10**) references viability analysis previously provided to WSCC by the Appellant which showed that *“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”*
- 1.3.9 As set out in my Proof of Evidence, I do not agree that this level of bus mode share is realistically achievable at the Appeal Site, as it is significantly higher than any bus mode share achieved elsewhere in Mid-Sussex.
- 1.3.10 However, consistent with my Proof of Evidence, I have undertaken an additional viability analysis to assess whether the bus service would be viable should that mode share be achieved.
- 1.3.11 **TABLE 1.2** below shows an updated viability analysis based on a 4.9% bus mode, which WSCC asserts is required for the bus service to be viable. Information on daily trips, bus service operating costs, operating days and ticket prices have been based on the information provided by Appellant.

		SOURCE
Daily Trips (All Modes)	12,993	Mr Steven Rebuttal Appendix MS8
Bus Mode Share	4.9%	Analysis presented at Section 5.3 of my Evidence
Daily Bus Trips	637	Daily Trips x Bus Mode Share
Bus Fare	£3.73 (In Year 10 +2)	Mr Steven Rebuttal Appendix MS8
Revenue Per Day	£2,376.01	Daily Trips x Bus Fare
Operating Weekday Per Year	312	Mr Steven Rebuttal Appendix MS8
Revenue Per Year	£741,315.12	Revenue Per Day x Operating Days Per Year
Operating Costs Per Year	£1,028,651.88 (In Year 10 +2)	Mr Steven Rebuttal Appendix MS8
Operating Loss Per Year	£287,336.76	Revenue Per Year minus Operating Costs Per Year

- 1.3.12 The above analysis demonstrates that, in the unlikely situation that a 4.9% bus mode share was achieved, the bus services will operate with a loss of £287,336 per annum.
- 1.3.13 This is a worse situation than the information presented within my Proof of Evidence which concluded that, if a 4.9% bus mode share was achieved, the bus services would operate with a loss of £188,832 per annum.



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1.3.14 I would highlight that the only changes to my bus service viability analysis, from that presented in my Proof of Evidence, are to reflect updated information provided by Mr Stevens in his Rebuttal Proof of Evidence regarding bus service operating costs, ticket prices and operating days on which my analysis is now consistent with Mr Stevens.

1.4 SUMMARY

- 1.4.1 This Rebuttal Note has been provided following additional evidence provided by Mr Stevens in his Rebuttal Evidence dated May 2026 (**CD8.8**).
- 1.4.2 This Rebuttal Note provides an update to the bus service viability analysis presented in my Proof of Evidence (**CD10.3**) to reflect the new information provided by Mr Stevens on bus services costs and operating days of the bus services.
- 1.4.3 My updated viability analysis shows that, under both scenarios of mode share presented in my Proof of Evidence, the bus service will operate at a significant annual loss.
- 1.4.4 Furthermore, under both scenarios, the level of annual operating loss is worse than the analysis presented within my Proof of Evidence. The only changes to my bus service viability analysis from that presented in my Proof of Evidence is to reflect updated information provided by Mr Stevens in his Rebuttal Proof of Evidence relating to bus service costs, ticket prices and operating days.
- 1.4.5 My evidence therefore continues to demonstrate that the proposed bus service are not commercially viable and will likely be withdrawn from service following any initial period of developer funding
- 1.4.6 Once the service is withdrawn, the Appeal Site will be inaccessible to public transport. On that basis the Appeal Scheme will not provide a genuine choice of mode of travel, and this will result in greater reliance on private car usage and higher levels of vehicle trips will be generated.

