

Summary of the Proof of Evidence

Transport and Accessibility

1. This Proof of Evidence has been prepared in relation to a planning appeal concerning development proposals at land east of Ansty, Cuckfield Bypass, Cuckfield, RH17 5AG. It considers whether the appeal site is in a suitable location, with particular regard to access to services and facilities by walking, cycling and public transport, in accordance with national and local planning policy.
2. In my professional opinion, the appeal site is not sustainably located and the Appellant has not demonstrated that it can be made sustainable. The site is poorly connected to surrounding settlements and key destinations, and future residents would be largely reliant on the private car.
3. My evidence shows that many important facilities, including Warden Park Academy, Cuckfield village centre, Haywards Heath town centre and Haywards Heath railway station, are beyond accepted walking distances when assessed against CIHT guidance and Manual for Streets. As a result, walking to these destinations would not be realistic for the majority of residents.
4. Existing pedestrian and cycle infrastructure in the vicinity of the site is very limited. The routes relied upon by the Appellant, including Public Right of Way 8aCU, Newbury Lane, Copyhold Lane and Bridleway 67CR, are narrow, unlit, largely unmade and, in some instances, shared with vehicles, including agricultural vehicles. These routes lack appropriate width, surfacing, lighting and segregation, and are not suitable for vulnerable users. The routes identified by the Appellant do not provide continuous, safe or convenient walking and cycling routes between the site and Cuckfield, Warden Park Academy or Haywards Heath. In addition, no pedestrian or cycle connection is proposed between the appeal site and Burgess Hill, despite this being identified by the Appellant as a primary desire line.
5. Although the Appellant refers to improvements to public rights of way, my evidence demonstrates that these are not clearly defined. In several cases there is a lack of drawings or detail, and claimed upgrades are not shown consistently across submitted plans. No safety audits or assessments of pedestrian, cyclist and vehicle interaction have been provided. In my view, the proposed arrangements do not demonstrate compliance with policy requirements to prioritise walking and cycling or to provide safe and suitable access.

6. The appeal site is currently poorly served by public transport. The Appellant proposes new bus services, but these are not supported by defined routing, timetables or hours of operation. The proposed services would operate only during weekday daytime periods, with no evening or weekend provision. The assessment of likely bus usage relies on assumptions derived from 2021 Census data gathered during COVID-19 travel restrictions and from a different Census area with significantly better access to services and public transport.
7. Using 2011 Census data for Mid Sussex, my evidence shows that realistic bus mode shares in the area are approximately 1.5 to 2 per cent. When these figures are applied to the Appellant's own cost information, the proposed bus services would operate at a substantial annual loss, even when the development is fully built out. Even adopting the higher bus mode share suggested by West Sussex County Council, the services would remain commercially unviable. The Appellant's assessment also overestimates revenue by assuming fare increases despite the current fare cap, by not accounting for concessionary fares, and by assuming revenue generation beyond the limited hours of operation.
8. In my opinion, it is likely that any bus services would be withdrawn following the cessation of developer funding. If this were to occur, the site would have very limited access to public transport.
9. Drawing my evidence together, the appeal site is not sustainably located, appropriate walking and cycling connections are not provided, and the proposed public transport measures are not viable in the long term. The development would therefore be reliant on private car travel and would not provide a genuine choice of transport modes. For these reasons, the proposal conflicts with national and local transport policy and should be dismissed on transport grounds.

David Gwyn Lewis MSc MCIHT

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