

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

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

## CONTENTS

1.	Experience & Qualifications.....	1
2.	Introduction & Scope of Evidence.....	3
	<u>Planning History</u> .....	3
	<u>Highways Statement of Common Ground</u> .....	5
	<u>Rule 6(6) Statement of Case</u> .....	6
	<u>Scope of Evidence</u> .....	7
3.	Policy Review.....	9
	<u>National Planning Policy Framework</u> .....	9
	<u>Mid Sussex District Plan (“MSDP”) 2014-2031</u> .....	11
	<u>Ansty, Staplefield &amp; Brook Street Neighbourhood Plan 2015-2031</u> .....	12
	<u>Cuckfield Neighbourhood Plan 2011-2031</u> .....	12
4.	Assessment of Locational Sustainability.....	13
	<u>Vision-Led Approach</u> .....	13
	<u>Baseline Site Accessibility</u> .....	15
	<u>Active Travel Infrastructure Delivery Package</u> .....	27
	<u>Bus Strategy Delivery Package</u> .....	32
	<u>Highway Infrastructure Package</u> .....	37
	<u>Trip Monitoring Strategy</u> .....	40
	<u>Travel Plan</u> .....	42
5.	Conclusions.....	43

## Tables

Table 4.1	Walking / Cycling Guidance.....	18
Table 4.2	Summary of Local Facilities / Amenities (Distance to centre of Site).....	19
Table 4.3	Weekday AM Peak (07:00-08:00) Departures from Haywards Heath (Rail).....	25
Table 4.4	Weekday PM Peak (18:00-19:00) Arrivals to Haywards Heath (Rail).....	26
Table 4.5	Agreed Baseline Mode Split.....	41

## Appendices

Appendix MS1	Illustrative Masterplan (Scheme B)
Appendix MS2	Plan 2207280-002B (B2036 London Rd / Ardingly Rd Improvements)
	Plan 2207280-003G (Northern Access Roundabout)
	Plan 2207280-004G (Western Access Roundabout)
	Plan 2207280-005E (Southern Access Roundabout)
	Plan 2207280-007D (A272 / Bolney Rd / B2036 Improvements)
	Plan 2207280-014A (Public Rights of Way Improvement Plan)
	Plan 2207280-016C (A272 / B2272 Tylers Green Roundabout Improvements)
	Plan 2207280-SK01 (Mobility Hub Examples)
	Plan 2207280-SK05H (Cycle Route Improvement Plan (Sheet 1))
	Plan 2207280-SK05.1H (Cycle Route Improvement Plan (Sheet 2))
	Plan 2207280-SK06 (Mini Mobility Hub Examples)
Appendix MS3	Bus Service Strategy Catchment Plan

# 1. Experience & Qualifications

- 1.1 My name is Matt Stevens. I am a Member of the Institution of Highways and Transportation and an Executive Director of the firm Milestone Transport Planning Limited. I have 36 years' experience dealing with the highways and transportation implications of a wide range of private and public sector projects in locations throughout the country with full assessment under National and Local Planning Policy Guidance.
- 1.2 I am an expert highways witness and have appeared both on behalf of the Appellant and as a Rule 6 representative at numerous Appeal Hearings, Section 78 Inquiries, and Local Plan Examinations; acting on behalf of major housebuilders such as Persimmon Homes, Taylor Wimpey and Croudace Homes, development companies, private individuals, and strategic land promoters.
- 1.3 I advise clients on all technical aspects from the initial concept of scheme in terms of access, layout and off-site considerations, the identification of vision-led, practical transport solutions, through to the preparation of Transport Assessments, Travel Plans and Environmental Statements, negotiation of planning consents and subsequently through to discharging planning conditions, negotiations with respect to measures / contributions required for Section 106 and Section 278 Agreements and implementation of schemes.
- 1.4 I have experience of developing transport infrastructure solutions, addressing locational sustainability including schemes for enhancement of pedestrian, cycle and public transport routes and access to development, as well as the identification of both physical and management solutions to encourage access by non-car modes of travel through the preparation of Travel Plans.
- 1.5 I also have experience in the planning and design of highways infrastructure, including site access solutions, off-site highway schemes including the identification of both small and large scale improvement measures, traffic management and calming strategies, road marking and signing schemes.
- 1.6 My evidence is on behalf of Fairfax Acquisitions Limited and 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").
- 1.7 The description of development (the "Appeal Scheme"), as set out in the Decision Notice is:

*“Outline planning application (All matters reserved except for access) for the redevelopment of land east of Ansty to create a new Garden Community , comprising the erection of up to 1.450 homes (including 30% affordable housing), up to 90 residential care (C2 units), a primary school, a SEND school, health HUB, sports facilities including all weather hockey pitches and tennis centre, allotments, retail, community and employment uses with ancillary and associated development including new and enhanced pedestrian / cycle routes, open spaces and landscaping.”*

- 1.8 I have been retained by the Appellant to present highways and transport evidence at this Appeal. I have visited the Appeal Site and the surrounding area on many occasions since my instruction and therefore have a detailed background highways and transport knowledge for the purpose of giving evidence at this Appeal.
- 1.9 The evidence I have prepared and provided for this Appeal is true, has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are true and professional.

## 2. Introduction & Scope of Evidence

### Planning History

- 2.1 The Outline Planning Application (“OPA”) (Ref. DM/23/2866) was submitted to Mid Sussex District Council (“MSDC”) in November 2023 and was accompanied by a comprehensive suite of technical documents and reports prepared by the incumbent Transport Consultant appointed by the Appellants at that time, Ardent Consulting Engineers (“ACE”).
- 2.2 Throughout the determination period of the OPA, ACE engaged in extensive consultation and agreed matters with the relevant statutory consultees dealing with highways, transport, accessibility, and sustainability matters. This has included West Sussex County Council (“WSCC”), acting as the Local Highway Authority (“LHA”) as well as their Public Rights of Way (“PRoW”) officers, National Highways (“NH”) as the Highway Authority responsible for the Strategic Road Network (“SRN”) and Active Travel England (“ATE”), the government agency focussed on promoting walking, wheeling and cycling.
- 2.3 The MSDC Case Officer’s Report to Committee (CD3.1) dated 16 October 2025 at para. 2.14, with my emphasis underlined, stated:

*“In terms of transport matters, the vehicular access arrangements are acceptable. On the basis of the submitted evidence and the formal responses from the relevant highway authorities, the application would comply with Policy DP21 and the relevant provisions of national planning policy, which require that development should not result in a severe impact on the transport network.”*

*Subject to the recommended conditions and mitigation, no such severe impact has been identified. Furthermore, the application incorporates appropriate opportunities to promote sustainable transport and in particular the proposed bus services provide public transport improvements that will benefit existing residents in Ansty and Cuckfield villages. These improvements will be secured with a s106 Legal Agreement, and it is considered that this is a benefit of the scheme that should be afforded significant positive weight.”*

- 2.4 Further, the Case Officer’s Report confirms the following in respect of statutory consultee responses to the OPA submissions:
- (Para 5.12) WSCC Highways - *“No objection subject to S106 requirements and Conditions.”*
  - (Para 5.13) WSCC Public Rights of Way - *“No objection subject to conditions relating to public rights of way upgrades, surface improvements, connectivity for equestrians, and financial contributions, all to be agreed with WSCC.”*

- (Para 5.18) Active Travel England - *“Recommends approval of the application, subject to the agreement and implementation of planning conditions and/or obligations as set out in their response.”*
- (Para 5.25) National Highways - *“No objection subject to condition relating to the preparation of the Construction Traffic Management Plan.”*

2.5 The Case Officer’s Report also provides a summary of the joint submissions of Ansty and Staplefield Parish Council and Cuckfield Parish Council (the “Parish Councils”). In para. 6.3 of the Case Officer’s Report, on matters of transport, it states that:

*“The Parish Councils raise concerns about the site’s reliance on private car use and its limited connectivity to surrounding settlements and services. They reference technical analysis which suggests that the applicant’s Transport Assessment may overstate the accessibility of the site and understate the likely traffic impacts. They also highlight uncertainty around the long-term viability of proposed public transport improvements and consider the location to be fundamentally unsustainable in transport terms.”*

2.6 The OPA went to MSDC Planning Committee with Case Officer recommendation for approval. However, against Officer recommendation, the Planning Committee refused the application. The Decision Notice (CD3.3) dated 17 October 2025 states that the Appeal Site proposals are contrary to the development plan and cited three reasons for refusal:

*“1) The proposal consists of major development within the countryside, out of keeping with the rural character, which fails to protect the distinctiveness of the area by extending the settlement boundary of Ansty, resulting in the perceived coalescence with Cuckfield, eroding the rural nature of the site which is further harmed by the proposed loss of trees. The application is therefore contrary to policies DP12, DP13 and DP37 of the Mid Sussex District Plan 2014-2031, policies AS1 and AS2 of Ansty and Staplefield Neighbourhood Plan and policies CNP3 and CNP5 of Cuckfield Neighbourhood plan.*

*2) Due to the location and scale of the development, the proposal would result in an unacceptable urbanising feature, eroding the rural nature of the site that makes a positive contribution to the setting of the HWNL [High Weald National Landscape]. The proposal would therefore fail to avoid and minimise the adverse impact on the High Weald National Landscape to the detriment of the scenic beauty of the designated area. The proposal is therefore contrary to policy DP16 of the Mid Sussex District Plan 2014-2031, policy AS1 of the Ansty and Staplefield Neighbourhood Plan and policy CNP5 of the Cuckfield Neighbourhood Plan, the High Weald AONB Management Plan 2024-2029 and paragraph 189 of the NPPF.*

*3) The proposal fails to provide the infrastructure, contributions, and off-site highways works to serve the development and the required affordable housing. The application therefore conflicts with policies DP20, DP21, DP31 and DP38 of the Mid Sussex District Plan 2014-2029 the Mid Sussex Supplementary Planning Documents 'Affordable Housing' and 'Development Infrastructure and Contributions'.*

## Highways Statement of Common Ground

2.7 Since the issuing of the Decision Notice, the Appellant and sought to further engage with WSCC to agree matters of common ground for the purposes of this Appeal. The Highways Statement of Common Ground ("HSoCG") is signed by both parties and submitted to the Inspector as a Core Document, (CD7.2).

2.8 Para. 1.9 of the HSoCG sets out the agreed position between the Appellant and WSCC, as LHA, on the three reasons for refusal, whereby:

- Reason 1: does not engage any transport matters and that the Appellant's consultant, ACE, have completed a robust assessment of the impact of the proposal upon the local highway network, as required by Policy AS1 part (c) of the Ansty and Staplefield Neighbourhood Plan.
- Reason 2: the location and scale of the development contributes to the sustainability of the Appeal Scheme but otherwise transport matters are not engaged.
- Reason 3: is only relevant in respect of the procedure for securing the planning conditions necessary for mitigating the transport impacts of the development.

2.9 Section 6 of the HSoCG summarises the agreed position between the Appellant and WSCC regarding the Appeal Site proposals. With my emphasis underlined, Para 6.1 states:

*"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."*

2.10 Para 6.2 of the HSoCG continues:

*"In accordance with 115(b) of the Framework, the three vehicular points of access to the Appeal Site, in the form of 3-arm roundabouts, make provisions for all road users, are safe and can accommodate background traffic demand on the network as well as the additional movements generated by the Appeal Site proposals."*

2.11 Further, para. 6.3 of the HSoCG states that:

*"The vision-led off-site package of works, agreed with WSCC and with input from other consultees including the PRow team, ATE and NH, and secured either by way of S106 or S278 Agreement, means that all capacity, congestion and highway safety impacts on the transport network arising from the Appeal Site have been comprehensively and cost-effectively mitigated to an acceptable degree, in accordance with 115(d) of the Framework."*

2.12 Para 6.4 of the HSoCG confirms that there are no highways and transport matters that remain in dispute between the Appellant and WSCC.

### Rule 6(6) Statement of Case

2.13 As confirmed by PINS in correspondence dated 5 March 2026, the Parish Councils are confirmed as a Rule 6(6) Party for the purposes of this Appeal. On the 2 April 2026, the Parish Council submitted their Statement of Case ("SoC") to PINS in respect of the Appeal Site proposals (CD15.3).

2.14 Para. 1.7 of the Parish Council's SoC states that their intention is to submit evidence on the acceptability of the Appeal Site proposals in terms of their locational sustainability. Section 4 of the Parish Council's SoC sets out their main issues, and I have paraphrased the key elements below:

- Para 4.4 - *"...facilities, amenities and local settlements would be largely inaccessible for the majority of residents...given the distances involved and lack of supporting infrastructure."*
- Para 4.5 - *"...the site should not be considered accessible by foot and will encourage additional travel by private car to the wider area..."*
- Para 4.6 - The Parish Councils refer to *"...the limitations and long term viability of the proposed bus route and the constraints on pedestrian and cycle connections which the site would need to rely upon."*

2.15 With specific reference to the long-term viability of proposed bus service, the modal shift that can be realised from it, and the weight attributed to it in regard to Planning Balance, para 4.17 the Parish Councils SoC continues to state that: *"...concerns are raised about the precise commitments being made and its long-term viability, particularly beyond any initial developer-funded period, meaning that it is considered insufficient to remedy this fundamental constraint."*

## Scope of Evidence

- 2.16 The evidence that I am presenting to this Appeal is specifically focussed on responding to and addressing the locational sustainability matters raised within the Parish Councils SoC.
- 2.17 Within the remaining sections of my evidence I will demonstrate, contrary to the Parish Councils position, that:
- The Appeal Site is, and will be made, an extremely sustainable location, with day-to-day facilities and amenities easily accessible by active travel modes (walking and cycling). Additionally, the Appeal Site is provided with direct access to a high-frequency, seven-day-a-week, bus service which provides future residents with convenient connections to a wide range of retail, employment, education, and leisure destinations, as well as major multi-modal transport hubs.
  - By virtue of the wide range of active and sustainable travel options available and the commitment given by the Appellant in regard to the implementation of Travel Plan measures / initiatives, coupled with the significant S106 contributions, physical infrastructure improvements, modal shift towards sustainable transport modes is not only encouraged but, in my expert opinion, it will be realised.
  - The Appeal Site can deliver *'step change'* improvements to the local walking, wheeling, and cycling environment. These will not only enhance the quality and safety of active travel connections to local facilities / amenities for the benefit of future residents within the Appeal Site but will also provide measurable improvements for the residents within the existing local community surrounding the Appeal Site.
- 2.18 My evidence demonstrates a comprehensive vision-led approach consistent with paras. 109, 110 and 115 of the National Planning Policy Framework (the "Framework"). On this basis, and in line with para. 116 of the Framework, the Appeal Site would not give rise to an unacceptable impact on highway safety and that any residual cumulative impacts on the road network can be effectively mitigated and will not be severe.

2.19 The subsequent sections of my evidence are presented as follows:

- Section 3 - Planning Policy Review
  - a detailed critique of relevant Planning Policy at both National and Local level and how the Appeal Site proposals have positively responded to this.
- Section 4 - Assessment of Locational Sustainability
  - a detailed appraisal of the locational characteristics of the Appeal Site relative to facilities and services and opportunities for access by sustainable modes of transport.
  - a detailed summary of the infrastructure deliverables and commitments that can be secured by the Appeal Site proposals should the Planning Inspector be minded to grant consent.
  - a direct response to the Parish Council's main issues raised in their SoC.
- Section 5 - Summary & Conclusions

### 3. Policy Review

#### National Planning Policy Framework

- 3.1 Section 9 of the Framework is entitled *'Promoting Sustainable Transport'* and at Para. 109 is focussed on *"...a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places."*
- 3.2 As I will demonstrate in Section 4 of my evidence, the Appeal Site directly responds to the six objectives set out within Para. 109 of the Framework demonstrating that:
- a) Transport considerations have framed engagement with all key stakeholders, including the local community.
  - b) Patterns of movement, streets, parking, and other transport considerations have been integral in the development of the illustrative masterplan and the phasing of infrastructure transport deliverables.
  - c) The potential impacts of development on transport networks have been understood and addressed in the development of the comprehensive off-site active travel, public transport, and highways infrastructure delivery packages.
  - d) Opportunities from existing or proposed transport infrastructure, changing transport technology and usage have been explored and accommodated.
  - e) Opportunities to promote walking, cycling and public transport use have been identified and pursued.
  - f) Appropriate opportunities have been taken to avoid and mitigate any effects arising from the environmental impacts of traffic and transport infrastructure arising from the development.
- 3.3 I consider that full account has been taken of para. 109 in the preparation of the supporting material submitted with the planning application, as confirmed in the HSoCG.
- 3.4 In the context of the locational sustainability, I consider that para. 110 of the Framework is the core policy against which the suitability of development on the Appeal Site is evaluated. Key in the context of the Appeal Site, it states:
- "Significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."*
- 3.5 Of note, *"...limiting the need to travel..."* and *"...genuine choice of transport modes"* is directly referenced and addressed in Section 4 of my evidence.

- 3.6 Para. 110 continues to recognise that opportunities to maximise sustainable transport solutions vary between urban areas and rural areas. In other words, local context and opportunities are clearly important considerations when assessing the accessibility and sustainability credentials of the Appeal Site. Again, in my opinion, I directly reference and address this in Section 4 of my evidence.
- 3.7 Para. 115 of the Framework is also a core policy against which the suitability of development on the Appeal Site is evaluated. Within Sections 4 of my evidence, I will clearly demonstrate that the Appeal Site proposals deliver on:
- a) Prioritising sustainable transport modes in the context of the vision for the Appeal Site, the type of development and its location.
  - b) Safe and suitable access to the Appeal Site for all road users.
  - c) The design of streets, parking areas, and other transport elements in accordance with the National Design Guide and the National Model Design Code, recognising that the material submitted with the Outline Application is illustrative and subject to confirmation at Reserved Matters should the Inspector be minded to grant permission.
  - d) No significant impacts on the transport network, or on highway safety.
- 3.8 Indeed, in the context of part d) of Para. 115, my expert opinion is that the mitigation which 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. It also delivers choice to future prospective residents in travel mode when accessing the full range of facilities and services. On that basis, I consider that the mitigation measures reduce future residents' reliance on the use of private car.
- 3.9 Para. 116 of the Framework sets out two key tests against which development should be prevented or refused on highway grounds: 1) unacceptable impact on highway safety; and 2) residual cumulative impacts on the road network, following mitigation, being severe taking account of all reasonable future scenarios.
- 3.10 As evidenced in the material submitted with the OPA, the consultation responses received from key stakeholders (para. 2.4 of my evidence), and Section 4 of my Proof, neither of these tests are applicable to the Appeal Site proposals.

## Mid Sussex District Plan (“MSDP”) 2014-2031

- 3.11 In addressing the locational sustainability of the Appeal Site from a transport perspective, the key policies within the MSDP are: DP20 Securing Infrastructure; DP21 Transport; and DP22 Rights of Way and other Recreational Routes.
- 3.12 Policy DP20: Securing Infrastructure requires development to deliver the necessary infrastructure through a combination of deliverable physical mitigation works and planning obligations (S106 Agreements), in the right place and at the right time to ensure that development is adequately served without overstressing existing infrastructure and putting an unacceptable strain on the environment; and to create efficient and sustainable transport networks as well as sustainable communities.
- 3.13 Policy DP21: Transport of the MSDP continues the same theme as DP20 and requires that:
- Development is sustainably located to minimise the need for travel.
  - Appropriate opportunities to facilitate and promote the increased use of alternative means of transport to the private car, such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport, including suitable facilities for secure and safe cycle parking, are fully explored and taken up.
  - Appropriate mitigation to support new development and measures put in place to address impacts of movement generated by development is effective and demonstrably deliverable including setting out how schemes will be funded.
  - Development avoids severe additional traffic congestion, individually or cumulatively, taking account of any proposed mitigation.
- 3.14 DP21 also requires that schemes are designed to adoptable standards on matters relating to road widths and size of garages, car parking as well as facilities for charging plug-in and other ultra-low emission vehicles. I consider these to be important factors; however, these are all reserved matters for determination in due course should the Inspector be minded to grant permission for the OPA.
- 3.15 In the context of the Appeal Site proposals, Section 4 of my evidence will demonstrate the commitment of the Appellant to secure a comprehensive package of on and off-site mitigation, aligned with the vision-led approach required within the Framework, and coupled with an extensive package of planning obligations, including details of trigger points and payments which meet the statutory tests required by Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended).

3.16 Policy DP22: Rights of Way and other Recreational Routes of the MSDC is in place to ensure development seeks to does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes. Section 4 of my evidence will demonstrate that the Appeal Site proposals will deliver on the key objectives of Policy DP22 including:

- Safe and convenient links to and enhancements of the established Rights of Way network that are multi-functional allowing use by walkers, cyclists, and horse-riders, supplemented by an extensive network of new and enhanced other recreational routes within the Appeal Site.
- Additional routes between the Appeal Site and local settlements, including Ansty, Cuckfield, Haywards Heath and Burgess Hill that deliver a joined up network.

#### Ansty, Staplefield & Brook Street Neighbourhood Plan 2015-2031

3.17 In respect of new housing development, Policy AS1 of the Ansty, Staplefield & Brook Street Neighbourhood Plan requires a scheme to contribute towards sustainable development (part a)) and provides a robust assessment of impact on the local highway network (part c)).

3.18 Policy AS14 states that *“The provision of improved walking and cycling routes to Cuckfield, Haywards Heath and other surrounding villages will be strongly supported.”*

#### Cuckfield Neighbourhood Plan 2011-2031

3.19 Policy CNP 16 of the Cuckfield Neighbourhood Plan addresses matters related to the transport impact of development and seeks to ensure that proposals address: safe vehicular and pedestrian access; sustainable transport links to the principal village facilities; the delivery of, or contributions towards, transport infrastructure (walking, cycling, public transport and other highway improvements) where required to mitigate impacts; and the maintenance and enhancement of existing Public Rights of Way.

3.20 Policy CNP 21 requires that any infrastructure required to support development, either physical works or via planning obligations, is to be provided in a timely manner.

## 4. Assessment of Locational Sustainability

### Vision-Led Approach

- 4.1 The vision-led approach adopted by ACE on behalf of the Appellant is set out within Section 5 of the ACE Transport Addendum (May 2025) (CD2.11). Specifically, para. 5.7 of that reference document states:

*“...the vision for the proposed development is to create a sustainable, liveable neighbourhood anchored by an internal and external network of active and sustainable travel options, with convenient opportunities for mode change threaded throughout the site.”*

- 4.2 The objective-led vision is a result of extensive, positive coordination and collaboration with WSCC, NH, ATE, local bus operators and other key stakeholders to ensure that active and sustainable travel are embedded at the centre of the design decisions taken as well as facilities and services that are to be delivered throughout the lifetime of the development.
- 4.3 Section 2 of the ACE Transport Addendum (May 2025) (CD2.11) and Appendix A of the same document confirms that, in respect of ATE, an initial consultation response to the submission of the OPA was received on 22 December 2023 (CD4.74), and a meeting was held between ACE and ATE on 15 August 2024.
- 4.4 A further Transport Technical Note (“TTN”) was produced by ACE included as Appendix A to the ACE Transport Addendum (November 2024) (CD2.50) which provided clarification and further information related to the multi-modal trip generation and assignment, access roundabout crossing facilities, public rights of way, internal crossing locations and permeability, mobility hubs, and active travel infrastructure at the non-residential uses within the Appeal Site proposals.
- 4.5 ATE were satisfied with the additional clarification / information provided by ACE and this then led to a follow-up consultation response from ATE dated 16 December 2024 (CD4.32), recommending approval subject to Conditions and/or obligations.
- 4.6 In respect of the WSCC PRow team, Section 3 of the ACE Transport Addendum (May 2025) (CD2.11) and Appendix B of the same document confirms that an initial pre-application consultation was conducted on 21 August 2023.

- 4.7 Following an initial consultation response from WSCC PRow team to the OPA submission on 10 January 2024 (CD4.71), a TTN was prepared by ACE, dated May 2024, included as Appendix A to the ACE Transport Addendum (November 2024) (CD2.50), providing further clarification and additional information requested, addressing matters related to footpath upgrades, continuity of the PRow network, surfacing improvements and specific details related to the upgrade of Bridleway 67CR / 50bCU.
- 4.8 A subsequent consultation response from the WSCC PRow team on 5 December 2024 (CD4.36) confirmed their position of no objection, subject to Conditions.
- 4.9 Engagement between ACE and the WSCC Development Management team has been extensive with ongoing pre-application discussions during the period October 2022 - October 2023 on all pertinent highways and transport matters related to the emerging development proposals for the Appeal Site, not least including streetscape design active travel and public transport strategies and strategic modelling approach.
- 4.10 Post submission of the OPA, WSCC issued an initial consultation response on 29 January 2024 (CD4.61). Dialogue between parties continued and a series of meetings (April 2024, February 2025) and TTNs prepared to address detailed matters, included as Appendix C to the ACE Transport Addendum (November 2024) (CD2.50) and ACE Transport Addendum (May 2025) (CD2.11).
- 4.11 Section 4 of the ACE Transport Addendum (May 2025) (CD2.11) and Appendix C of the same document sets out in full the sequence of requests made by the WSCC Development Management team and the ACE responses on wide-ranging matters including Road Safety Audits / Designers Response, the upgrade of PRowS and the cycle connections to Haywards Heath, Cuckfield, Burgess Hill and the country park, crossing facilities on the A272, public transport, trip generation, trip rate reduction, monitoring strategies and alternative scenario is this strategy is not realised, sifting criteria for junction modelling, clarification on traffic flow diagrams, clarification on off-site mitigation at the B2036 London Road / Ardingly Road mini-roundabout, Car Club provision, speed limit changes, analysis of personal injury collisions on the surrounding road network Travel Plan provisions and journey times.
- 4.12 As set out within the HSoCG, para. 1.6., and as a result of the continuous dialogue between parties, WSCC confirmed no objection to the Appeal Site proposals, subject to the requisite S106 requirements and Conditions, in their consultation response dated 9 July 2025 (CD4.10).

- 4.13 With regard to NH, an initial consultation response to the submitted OPA was received on 19 January 2024 (CD4.63) following which ACE prepared a series of TTNs in July and December 2024 (CD2.38) responding to comments in subsequent responses from NH on matters related to the Vision Statement, collision analysis, Travel Plan, trip rate reductions, committed development assumptions, application of TEMPro growth rates, strategic modelling, traffic flow diagrams, sifting criteria, individual junction capacity modelling, mitigation and Travel Plan provisions.
- 4.14 Agreement was reached on all matters between ACE and NH which led to the further consultation response from NH dated 4 April 2025 (CD4.19) confirming their position of no objection, subject to Conditions.

### Baseline Site Accessibility

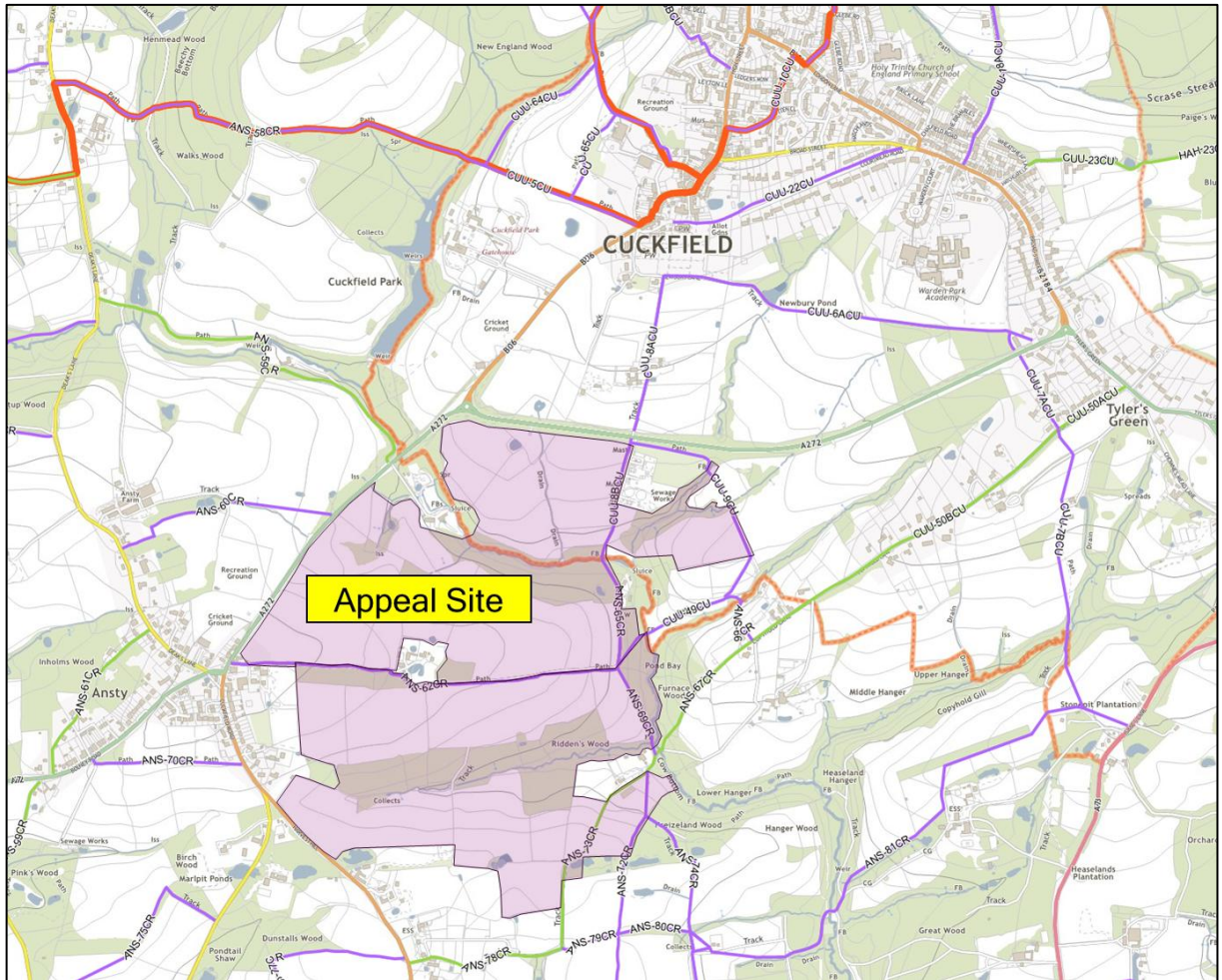
- 4.15 The Parish Councils SoC alleges that the Appeal Site is in an unsustainable location and that the facilities, amenities, and local settlements would be largely inaccessible due to distances and lack of infrastructure. As such, the Parish Councils believe the Appeal Scheme would fail to encourage a modal shift towards sustainable modes of transport.
- 4.16 Later in my evidence I expand on the comprehensive package of active travel and public transport infrastructure and improvements that is to be delivered by the Appeal Site in a timely manner, secured long-term by Conditions and Legal Agreement. But first, it is important to understand that the Appeal Site is not isolated from, and is in fact accessible by, a choice of active travel routes and public transport services that provide connectivity to local facilities, amenities, and local settlements.
- 4.17 As set out within Section 2 of the ACE Framework Travel Plan (December 2024) (CD2.36) the Appeal Site is located adjacent to the village of Ansty, within walking and cycling distance of the village of Cuckfield and within a reasonable cycling distance of Haywards Heath (4kms to the east of the Appeal Site) and Burgess Hill (6kms to the south of the Appeal Site).
- 4.18 There are a number of local facilities located within Ansty and Cuckfield, which allows for a degree of 'local living' by catering for some of the needs to existing residents, thereby minimising the need to travel and/or reducing journey times.
- 4.19 Footways exist on the A272 and B2036 corridors adjacent to the Appeal Site and there is an extensive network of PRoWs, including footpaths and bridleways, which extend to and through the Appeal Site connecting with local facilities and amenities.

- 4.20 Public transport in the area of the Appeal Site includes an existing, limited frequency bus service with stops in adjacency to the Appeal Site that connects with Cuckfield and Haywards Heath, including the railway station.

#### Existing Active Travel Routes

- 4.21 The A272 runs broadly along a north/south alignment to the west of the Appeal Site and is provided with a footway on the western side of the carriageway. This footway continues north along the western side of the B2036 into the centre of Cuckfield village. It also continues south into the centre of Ansty village.
- 4.22 Further south within Ansty village, a footway is present along the eastern side of the B2036 from the A272 mini-roundabout junction to the Cuckfield Road/B2036 junction, where the footway terminates. There is currently no footway in place along the A272 and B2036 Harvest Hill along the Appeal Site frontage and no formal crossing provisions in place.
- 4.23 The Appeal Site is traversed by a number of existing Public Rights of Ways (PRoWs) including Footpaths 62CR, 65CR, 69CR and 72CR and, as shown in Figure 4.1, the PRoW network extends from the Appeal Site to connect with a variety of destinations, including the village of Ansty adjacent to the western edge of the Appeal Site, as well as the larger village of Cuckfield to the north. Copyhold Lane to the east of the Appeal Site is a bridleway which can be used by pedestrians and cycles which connects east towards Haywards Heath.
- 4.24 Existing formal provision for cyclists in the vicinity of the Appeal Site is limited. Bridleways 73CR and 67CR run to the southwest of the Appeal Site, connecting the B2036 Harvest Hill to Copyhold Lane and then onwards towards Haywards Heath. A local cycle route is also present to the east of the Appeal Site, connecting Tylers Green into central Haywards Heath.

Figure 4.1 Existing PRow Network



Local Facilities and Services

4.25 Table 4.1 reveals that existing national planning guidance recognises walking and cycling as viable alternatives to private car use, particularly for shorter journeys.

**Table 4.1 Walking / Cycling Guidance**

Mode	Distance	Guidance / Notes
Comfortable Walking Distance	800-metres	Documents such as Manual for Streets (MfS) (DfT, 2007) (CD10.7), CIHT's 'Planning for Walking' (2015) (CD10.8) and the MHCLG 'National Design Guide' (2021) (CD6.9) define a walkable neighbourhood as one where key amenities are located within approximately 800-metres, or about a 10-minute walk.
Reasonable Walking Distance	1.6-kilometres	CIHT's 'Planning for Walking' (2015) (CD10.8) states <i>"Across Britain about 80 percent of journeys shorter than 1 mile (1.6km) are made wholly on foot"</i> .
Maximum Walking Distance	2.0-kilometres	MfS (CD10.7) states that <i>"Walking offers the greatest potential to replace short car trips, particularly those under 2km"</i> .
Comfortable Cycling Distance	3.2-kilometres	CIHT's 'Planning for Cycling' (2014) (CD6.10) states <i>"The majority of cycling trips are for short distances, with 80% being less than five miles and with 40% being less than two miles."</i> This indicates substantial potential for cycling to replace short-distance car trips within a 2 to 5-mile radius (i.e. 3.2 or 8.0-kilometres) of new residential developments.
Reasonable Cycle Distance	5.0-kilometres	Supporting this, Homes England's 'Building for a Healthy Life' (2020) (CD6.11) references National Travel Survey data showing that trips of up to three miles (i.e. 4.8-kilometres) can be conveniently made on foot or by bicycle where suitable infrastructure is provided.  Whilst Sustrans research concludes that routine car journeys of up to 5-kilometres could feasibly be replaced by cycling.

4.26 Table 4.2, as well as Figures 4.2 and 4.3, reveals the Appeal Site is conveniently located to a range of facilities and amenities within the aforementioned walking and cycling distances. These facilities and amenities will cater for the day-to-day convenience, educational, healthcare and leisure needs of future residents, supplementary to the comprehensive package of infrastructure, facilities and amenities that will be delivered by the Appeal Site.

**Table 4.2 Summary of Local Facilities / Amenities (Distance to centre of Site)**

Destination	Type of Amenity	Distance	Walk Journey Time*	Cycle Journey Time**
Ansty Cross (Shell) Garage, Spar & Royal Mail Post Box	Retail, Food & Drink	800-metres	12-minutes	4-minutes
Ansty Village Centre / Recreation Ground	Sports & Leisure / Community Facility	850-metres	11-minutes	3-minutes
Cuckfield Cricket Club / Norto 5 Kidz Academy (nursery)	Sports & Leisure / Education	1.6-kilometres	22-minutes	7-minutes
Holy Trinity Church, Cuckfield	Faith	1.6-kilometres	22-minutes	12-minutes
The Talbot PH	Food & Drink	1.6-kilometres	24-minutes	12-minutes
Nisa Foodstore, High Street, Cuckfield	Retail	1.7-kilometres	25-minutes	11-minutes
Cuckfield Chemist	Retail	1.8-kilometres	25-minutes	11-minutes
Cuckfield Village Hall	Leisure / Community Facility	2.4-kilometres	-	17-minutes
Holy Trinity C of E Primary School	Education	2.5-kilometres	-	18-minutes
Cuckfield Medical Practice / The Vale Surgery	Healthcare	2.5-kilometres	-	18-minutes
Warden Park Academy	Education	2.9-kilometres	-	18-minutes
Haywards Heath College	Education	4.2-kilometres	-	20-minutes
The Dolphin	Sports & Leisure	4.2-kilometres	-	20-minutes
Panattoni Park, Goddards Green, Burgess Hill	Employment	4.3-kilometres	-	14-minutes
Sainsbury's, Haywards Heath	Retail	4.5-kilometres	-	20-minutes
* Assumed walking speed of 1.33m/s (para. 4.11 of MfS)				
** Assumed cycle speed of 4.47m/s (10-mph) (lower limit in line with para. 5.1.2 of LTN1/20)				

Figure 4.2 Local Amenities to Appeal Site (Walk Catchment)

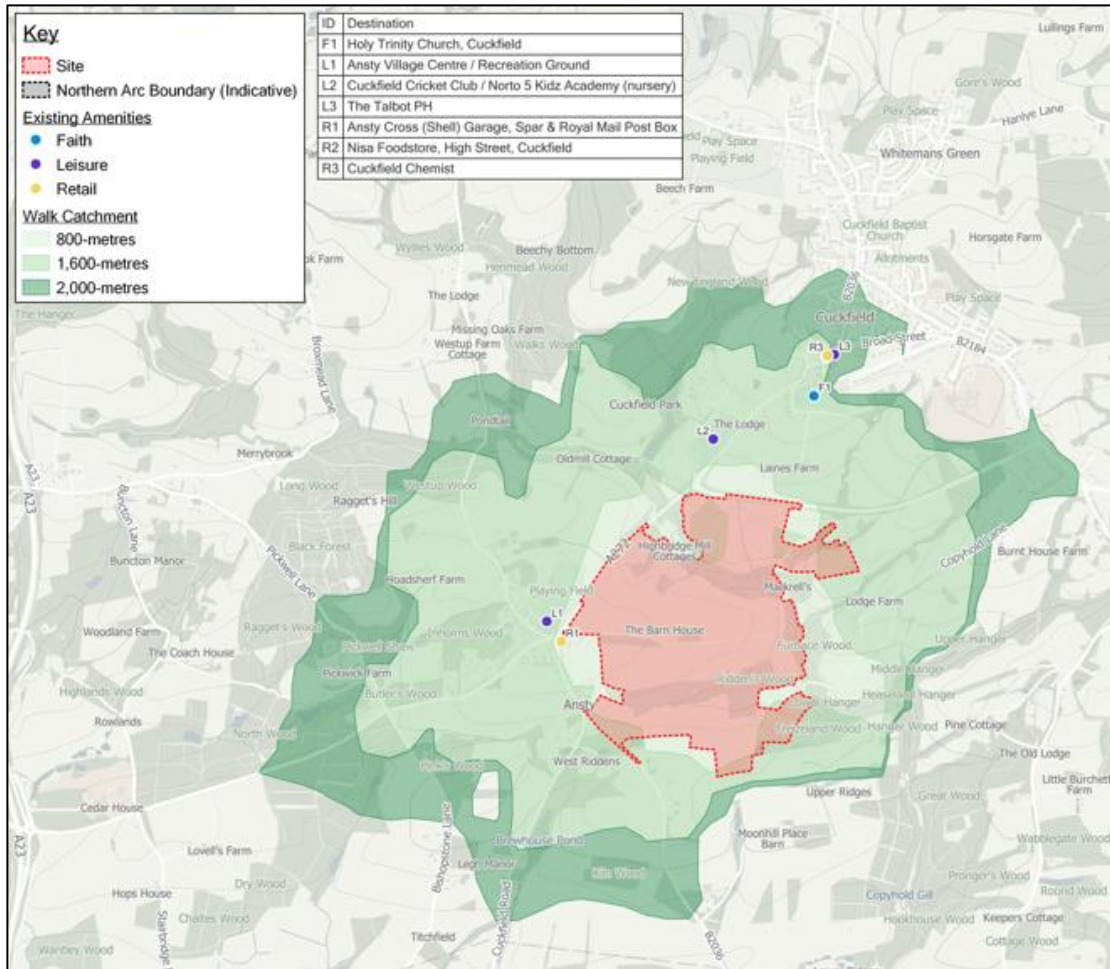
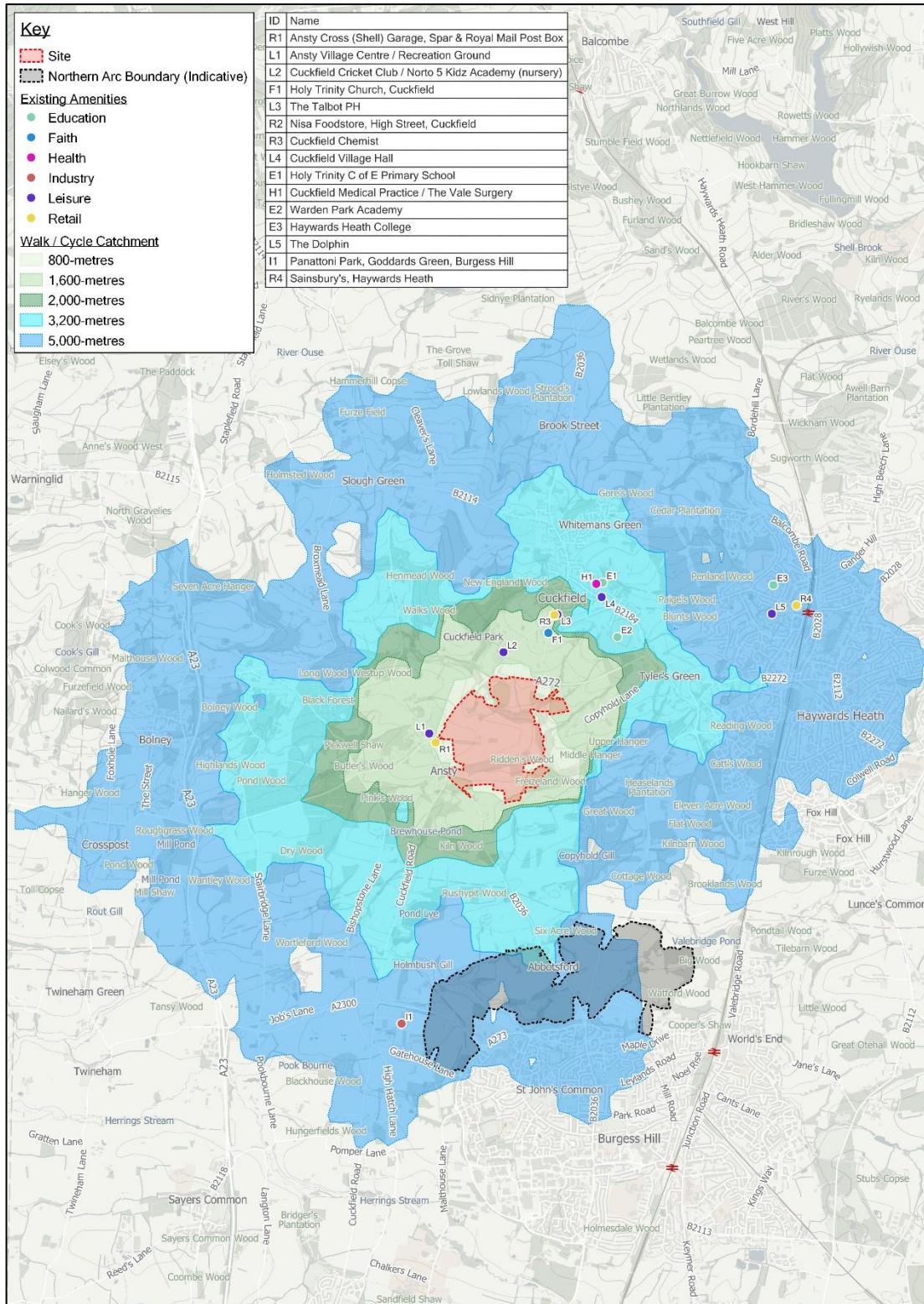


Figure 4.3 Local Amenities to Appeal Site (Walk & Cycle Catchment)



- 4.27 It is important to note that the distance, walk journey time and cycle journey time from local amenities are all determined from the centre of the Site using existing active travel routes.
- 4.28 Taking account of the comprehensive package of Active Travel Infrastructure interventions delivered by the Appeal Site as outlined in para's 4.46 - 4.56 of my evidence, future residents will have the benefit of utilising the upgraded Footpath 62CR to Bridleway specification with improved surfacing and wayfinding to access the Ansty Cross (Shell) Garage with its local retail facilities as well as the Ansty Village Centre / Recreation Ground to the west of the Appeal Site.
- 4.29 Where this meets the A272, the existing footway on approach to the roundabout junction with Bolney Road and the B2036 is provided with dropped kerbs for cycle access and is widened to 3.0-metres to provide a shared footway / cycleway facility. This then connects into the existing footway for direct access to the Ansty Cross Garage.
- 4.30 The existing refuge island in the centre of the A272 carriageway is widened to 3.0-metres to provide safe space for cyclists to wait alongside pedestrians. The crossing facility will be provided with both corduroy and tactile paving.
- 4.31 To the north of the roundabout a widened 3.0-metre shared footway / cycleway is provided that in turn transitions into the existing footway leading along the northern side of Bolney Road and the eastern side of Deak's Lane for direct access to the Ansty Village Centre / Recreation Ground. A dropped kerb on Bolney Road enables cyclists to enter the shared footway / cycleway.
- 4.32 To the north-west of the Appeal Site, future residents will be afforded improved access to Cuckfield Cricket Club / Norto 5 Kidz Academy. The Cycle Route Improvement Plan, referenced in para's 4.46 - 4.56 of my evidence, includes works to be delivered by the Appeal Site for a shared facility that crosses the A272 to the west of the northern roundabout and then continues on the western side of the B2036 as it extends north towards Cuckfield,
- 4.33 Facilities are provided for cyclists to safely merge / diverge to / from the existing carriageway at cricket club and pedestrians can continue north along the western side of the B2036 using the existing surfaced footway which extends into Cuckfield village.
- 4.34 An alternative off-carriageway route also exists for future residents of the Appeal Site to access Cuckfield village via the unsurfaced Footpath 8aCU and Newbury Lane. The Cycle Route Improvement Plan, referenced in para's 4.46 - 4.56 of my evidence, includes the provision of an improved crossing over the A272 to connect Footpath 8bCU to Footpath 8aCU incorporating dropped kerbs and tactile paving.

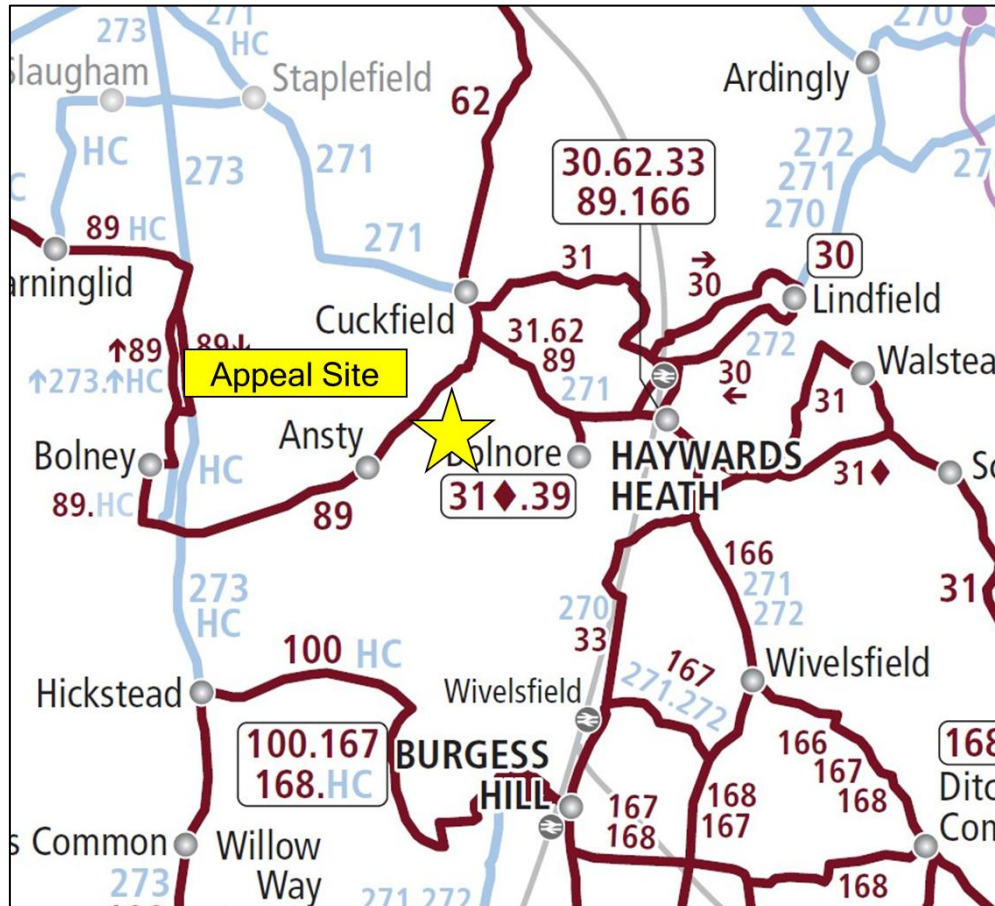
- 4.35 Towards Warden Park Academy as well as Haywards Heath town centre and railway station, the Cycle Route Improvement Plan, referenced in para's 4.46 - 4.56 of my evidence, extends east along the southern side of the A272 carriageway from the proposed northern roundabout access to the Appeal Site, comprising a lit 3.0m shared facility, separated from the main carriageway by a 2.5m verge.
- 4.36 At the junction with the B2184 Broad Street, the proposed shared footway / cycleway ties into the existing shared facilities on the eastern side of B2184 Broad Street, via the existing signalised crossing, and western side of the A272 Tylers Green. A surfaced footway then continues north on the B2184 Broad Street on both sides of the carriageway beyond Denning Place towards the entrance of Warden Park Academy.
- 4.37 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.

#### Existing Public Transport Options - Bus

- 4.38 Figure 4.4 shows the local bus routes and their relationship with the Appeal Site.
- 4.39 The closest existing bus stops to the Appeal Site are located within Ansty, on either side of the A272 Bolney Road. Both stops are served by Compass Travel Route 89 which extends between Horsham and Haywards Heath on a limited frequency of 4 return buses per day, Monday, Wednesday, and Friday and 2 return buses per day Tuesday and Thursday. There is no service on Saturdays and Sundays.
- 4.40 Cuckfield village is served by three other regular bus services, namely:
- 1) Compass Travel Route 31 which extends from Cuckfield to Uckfield via Haywards Heath on an hourly frequency, Monday to Saturday
  - 2) Compass Travel Route 62 which extends from Crawley to Haywards Heath on a frequency of 3 return buses per day Tuesday and Thursday, 1 return bus per day Monday, Wednesday, and Friday
  - 3) MetroBus Route 271 which extends from Crawley to Brighton via Haywards Heath and Burgess Hill on a frequency of one bus every 2 hours in both directions, 7 days-a-week.

- 4.41 The existing bus stops at High Street / Broad Street are located 900 metres north of the Appeal Site, accessed via Footpath 8aCU and 8bCU. There are also bus stops on these bus services at Copyhold Lane where it meets the A272 Tylers Green, 1.8kms east of the Appeal Site and accessed via Bridleway 50bCU.

Figure 4.4 Local Bus Routes to Appeal Site



Existing Public Transport Options - Rail

- 4.42 Haywards Heath railway station is located 3.5 kilometres north-east from the centre of the Appeal Site, via Copyhold Lane, and is served by the bus routes listed above.
- 4.43 Haywards Heath railway station is managed by Southern and all routes in and out of the station offer step-free access via lifts from footbridge or ground level to the platforms. Services to / from Haywards Heath are operated by Southern, Thameslink and Gatwick Express. The typical off-peak service in trains per hour ("tph") is:
- 2 tph to Bedford via Gatwick Airport, East Croydon, and London Bridge
  - 2 tph to Cambridge via Gatwick Airport, East Croydon, and London Bridge

- 6 tph to London Victoria via Gatwick Airport and East Croydon (4 of these are branded as Southern and 2 as Gatwick Express)
- 6 tph to Brighton (2 of these run non-stop, 2 call at Burgess Hill only and 2 call at all stations)
- 2 tph to Eastbourne via Lewes of which 1 continues to Ore via Hastings
- 2 tph to Littlehampton via Worthing

4.44 During evenings and on Sundays, the service between Brighton and Cambridge is reduced to hourly. In addition, the Gatwick Express services do not run on Sundays, and the station is instead served by a half-hourly Southern service between London Victoria and Brighton.

4.45 During weekday peak hours there are up to 14 tph to / from Haywards Heath railway station. Tables 4.3 and 4.4 provide a summary of northbound departures towards London in the AM peak (07:00-08:00hrs) and southbound arrivals from London in the PM Peak (18:00-19:00hrs), respectively.

**Table 4.3 Weekday AM Peak (07:00-08:00) Departures from Haywards Heath (Rail)**

Departure Time	Destination	Arrival Time (London Termini)
07:01	Cambridge via Gatwick Apt., E Croydon, London Bdge. & St Pancras	07:45 (London Bridge)
07:06	London Bridge via East Croydon	07:55 (London Bridge)
07:10	Bedford via Gatwick Apt., E Croydon, London Bdge. & St Pancras	08:20 (London Bridge)
07:12	London Victoria via Gatwick Airport, East Croydon & Clapham Junction	07:59 (London Victoria)
07:17	London Victoria via Gatwick Airport, East Croydon & Clapham Junction	08:06 (London Victoria)
07:19	Bedford via Gatwick Apt., E Croydon, London Bdge. & St Pancras	08:05 (London Bridge)
07:27	London Victoria via Gatwick Airport	08:11 (London Victoria)
07:31	Cambridge via Gatwick Apt., E Croydon, London Bdge. & St Pancras	08:15 (London Bridge)
07:36	London Bridge via East Croydon	08:25 (London Bridge)
07:40	Bedford via Gatwick Apt., E Croydon, London Bdge. & St Pancras	08:50 (London Bridge)
07:42	London Victoria via Gatwick Airport, East Croydon & Clapham Junction	08:29 (London Victoria)
07:47	London Victoria via Gatwick Airport, East Croydon & Clapham Junction	08:36 (London Victoria)
07:49	Bedford via Gatwick Apt., E Croydon, London Bdge. & St Pancras	08:35 (London Bridge)
07:57	London Victoria via Gatwick Airport	08:41 (London Victoria)

**Table 4.4** Weekday PM Peak (18:00-19:00) Arrivals to Haywards Heath (Rail)

Arrival Time	Destination	Departure Time (London Termini)
18:02	Littlehampton via Hove & Worthing	17:16 (London Victoria)
18:07	Eastbourne via Lewes	17:24 (London Victoria)
18:11	Brighton	17:29 (London Victoria)
18:16	Littlehampton via Hove & Worthing	17:33 (London Bridge)
18:22	Brighton (from Bedford)	17:35 (London Bridge)
18:29	Brighton (from Cambridge)	17:45 (London Bridge)
18:32	Littlehampton via Hove & Worthing	17:46 (London Victoria)
18:37	Ore via Lewes, Eastbourne & Hastings	17:54 (London Victoria)
18:41	Brighton	17:59 (London Victoria)
18:52	Brighton (from Bedford)	18:05 (London Bridge)
18:59	Brighton (from Cambridge)	18:15 (London Bridge)

## Active Travel Infrastructure Delivery Package

4.46 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.

4.47 This is further reinforced by the agreed position of the Appellant and WSCC set out within para. 6.1 of the HSoCG 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."*

4.48 The comprehensive package of interventions referenced in para 6.1 of the HSoCG, as fully agreed with WSCC, includes:

- 1) An extensive network of off-carriageway commuter and leisure routes within the Appeal Site for pedestrians and cyclists, as shown on the illustrative masterplan (Scheme B) (CD16.4) and included as **Appendix MS1** to my evidence.
- 2) The means of multi-modal access, including pedestrian / cycle crossings at key off-site locations to secure means of connection with existing infrastructure, as shown on ACE Plans 2207280-003G (Northern Access Roundabout), 2207280-004G (Western Access Roundabout), 2207280-005E (Southern Access Roundabout), 2207280-007D (Proposed Cycle Connections A272 / Bolney Road / B2036), and 2207280-SK05H (Cycle Route Improvement Plan (Sheet 1)), all included within **Appendix MS2** of my evidence.
- 3) 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, as shown on ACE Plan 2207280-SK01 and 2207280-SK06, both included within **Appendix MS2** of my evidence.

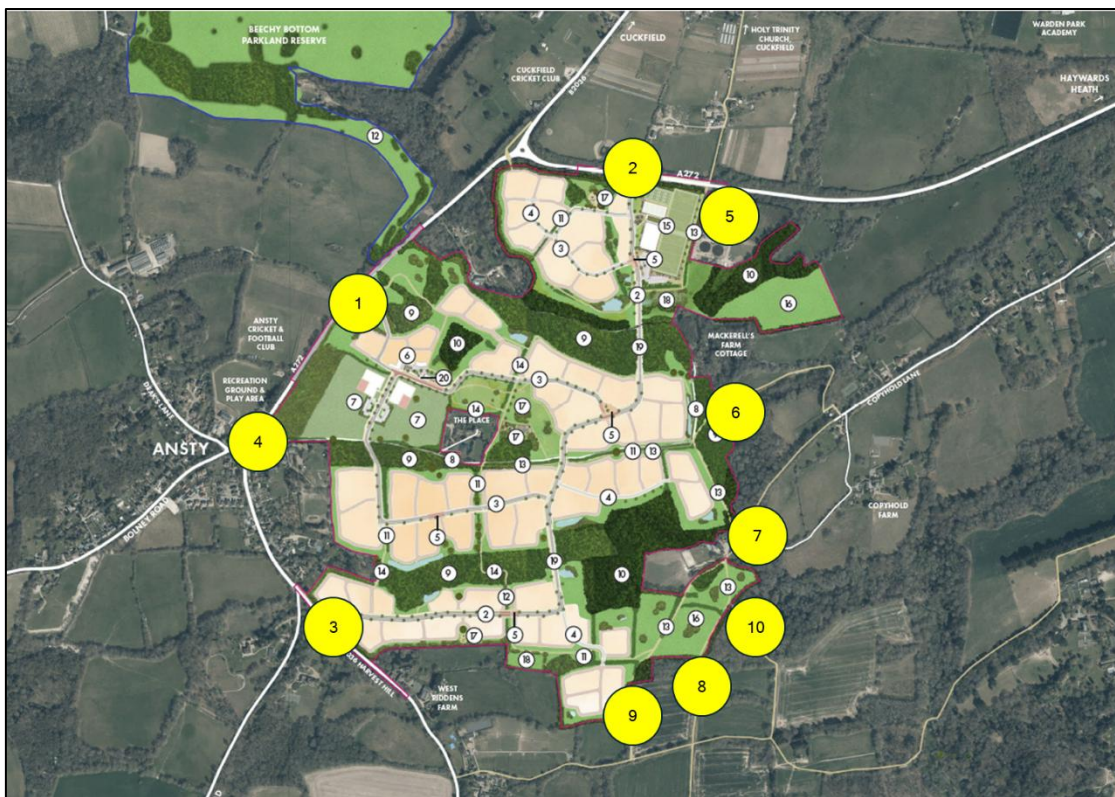
- 4) Pedestrian and cycle route improvements to Haywards Heath, as shown on ACE Plans 2207280-SK05H (Cycle Route Improvement Plan (Sheet 1)), 2207280-SK05.1H (Cycle Route Improvement Plan (Sheet 2)), and at the B2036 London Road / Ardingly Road mini-roundabout, as shown on ACE Plan 2207280-0002B, all included within **Appendix MS2** to my evidence.
  - 5) Upgrades to Public Rights of Way (“PRoW”) to include works to Footpath 62CR to Bridleway specification and improved surfacing on Bridleway 67CR / 50bCU, as shown on ACE Plans 2207280-014A (Public Rights of Way Improvement Plan) included within **Appendix MS2** to my evidence.
- 4.49 The Active Travel Infrastructure Strategy comprehensively addresses the desire lines for active travel movement between the Appeal Site and the villages of Ansty and Cuckfield, including Warden Park Academy, as well as Haywards Heath town centre and station, and, most importantly, fully meet the needs and safety of walkers, wheelers, and cyclists.
- 4.50 As well as ensuring that the Active Travel Infrastructure Strategy are sustainable and enable a genuine choice of transport modes for the benefit future occupiers of the Appeal Site, the package of interventions will deliver tangible benefits to existing residents in these neighbouring settlements.
- 4.51 Further, the sequence of Active Travel Infrastructure deliverables ensures that, at the earliest stage of each phase of development, in most cases being prior to the first occupation within that phase, active travel users are provided with connections to local services and amenities within the Appeal Site and surrounding settlements.
- 4.52 In this regard, the Active Travel Infrastructure Strategy reinforces the vision-led approach and meets the agreed objectives of influencing travel behaviour from ‘*day one*’, enabling the internalisation of a proportion of trips, reducing reliance on the private car, and thereby realising modal shift targets.
- 4.53 Throughout the phased development of the Appeal Site, these objectives will be continuously monitored through the Trip Monitoring Strategy. The delivery of the Active Travel Infrastructure Strategy can dynamically react, for example by accelerating elements linked to later phases, to ensure that these agreed objectives are realised.
- 4.54 The sequencing of delivery for the Active Travel Infrastructure Strategy is to be secured in a timely manner through the Section 106 Legal Agreement, and a suitably worded Condition requiring a Phasing Plan to be submitted to and approved by MSDC prior to the first Reserved Matters application.

- 4.55 All works will also be subject to the requisite Highway Agreement with WSCC including the associated detailed design and technical approvals process. This will also secure any requirement for commuted sums to ensure that the Active Travel Infrastructure works can be maintained in perpetuity for all users.
- 4.56 Should the Inspector be minded to grant permission, the Appellant is committed to the following trigger points for the delivery of the Active Travel Infrastructure Strategy:
- 1) Prior to first occupation of development works will be completed on the initial section of the Cycle Route Improvement Plan between the A272 / B2036 roundabout and the A272 / B2184 Broad Street roundabout to include new crossing facilities, facilitating access between the Appeal Site, Warden Park Academy and Cuckfield village.
  - 2) No more than 30% of the development is to be occupied until works will are completed to upgrade Footpath 62CR to Bridleway specification and to deliver safe crossing facilities on the A272 within Ansty village and north of the western roundabout as well as works to the southern roundabout on the B2036 Harvest Hill to access new bus stops.
  - 3) No more than 50% of the development is to be occupied until the remaining section of the Cycle Route Improvement Plan from the A272 / B2184 Broad Street roundabout to the B2272 Butlers Green Road / Paddockhall Road roundabout in Haywards Heath, including the shared footway / cycleway and associated safe crossing facilities are completed.
  - 4) No more than 50% of the development is to be occupied until works to provide improved crossing facilities in the form of zebra crossings at the B2036 London Road / Ardingly Road mini-roundabout as well as the upgrade to surfacing on Bridleway 67CR / 50bCU are completed.
- 4.57 In accordance with the MSDC Local Cycling and Walking Improvement Plan (“LCWIP”) (March 2023), which forms part of the evidence base for the Local Plan review, Policy DPT 3 Active Travel states:

*“Development will be required to help remove barriers to active travel and create a healthy environment in which people chose to walk and wheel; facilitated by, where appropriate, providing high quality, fit for purpose active travel infrastructure, within the development which links to existing networks and builds on the schemes identified in the Mid Sussex Local Cycling and Walking Infrastructure Plan (LCWIP)”.*

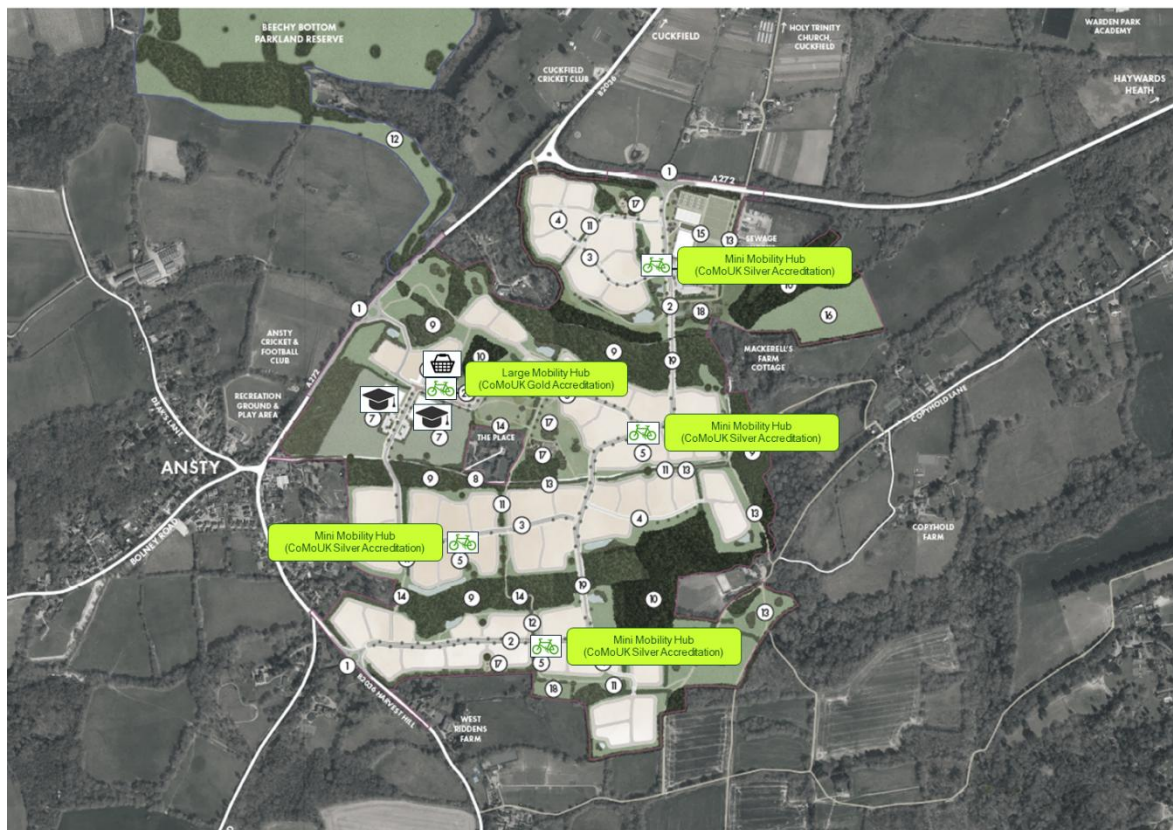
- 4.58 The Appeal Site will be arranged in such a way that it delivers a permeable network of streets to enhance active travel movements within the development and provide direct links to existing external active travel infrastructure and PRowS.
- 4.59 As agreed with WSCC during pre-application discussions, the primary LTN 1/20 compliant cycle route follows the primary street through the Appeal Site with a 3.0 - 4.5m on one side of the street and a 2m footway on the other side. Where the shared footway / cycleway crosses side roads, Copenhagen-style facilities or drop kerbs will be provided to ensure that the appropriate priority to active modes is communicated to drivers.
- 4.60 Also included within the Appeal Site are a series of recreational foot / cycle paths, providing additional significant interconnectivity between parcels within the development and to the main cycle route.
- 4.61 Significant interconnectivity with the existing and proposed active travel infrastructure external to the Appeal Site will be achieved through 10 separate access points, as shown on Figure 4.5. This includes:
- 1) The western access roundabout to the A272
  - 2) The northern access roundabout to the A272, linked to PRowS 8aCU and 8bCU
  - 3) The southern access roundabout to the B2036 Harvest Hill
  - 4) PRow 62CR to Ansty Village
  - 5) PRow 9CU to the eastern boundary of the Appeal Site
  - 6) PRow 49CU to the eastern boundary of the Appeal Site
  - 7) PRow 67CR to the south-eastern boundary of the Appeal Site
  - 8) PRow 72CR to the south-eastern boundary of the Appeal Site
  - 9) PRow 73CR to the south-eastern boundary of the Appeal Site
  - 10) PRow 74CR to the south-eastern boundary of the Appeal Site

Figure 4.5 Appeal Site Active Travel Access & Permeability



- 4.62 Within the Appeal Site, the Appellant is also committed to the delivery of a network of Mobility Hubs that will be delivered in conjunction with the phased release of development and the precise locations of facilities secured through subsequent Reserved Matters applications and are shown indicatively on the illustrative masterplan (Scheme B) in Figure 4.6.
- 4.63 Mini Mobility Hubs will be provided at all bus stop locations within the Appeal Site. In accordance with CoMoUK silver accreditation standards, the Mini Mobility Hubs will be location in prominent positions that are directly accessible from the internal pedestrian and cycle networks, well lit, compliant with accessibility guidance and provided with clear signage, They will include shared mobility features including cycle parking, cycle hire and car club hire, as well as real-time travel information signage and covered seating.
- 4.64 A Large Mobility Hub will be provided adjacent to the Local Centre / school within the Appeal Site that will comply with CoMoUK gold accreditation standards, incorporating all the above features as well as package delivery lockers.

Figure 4.6 Mini Mobility Hub Locations (Indicative)

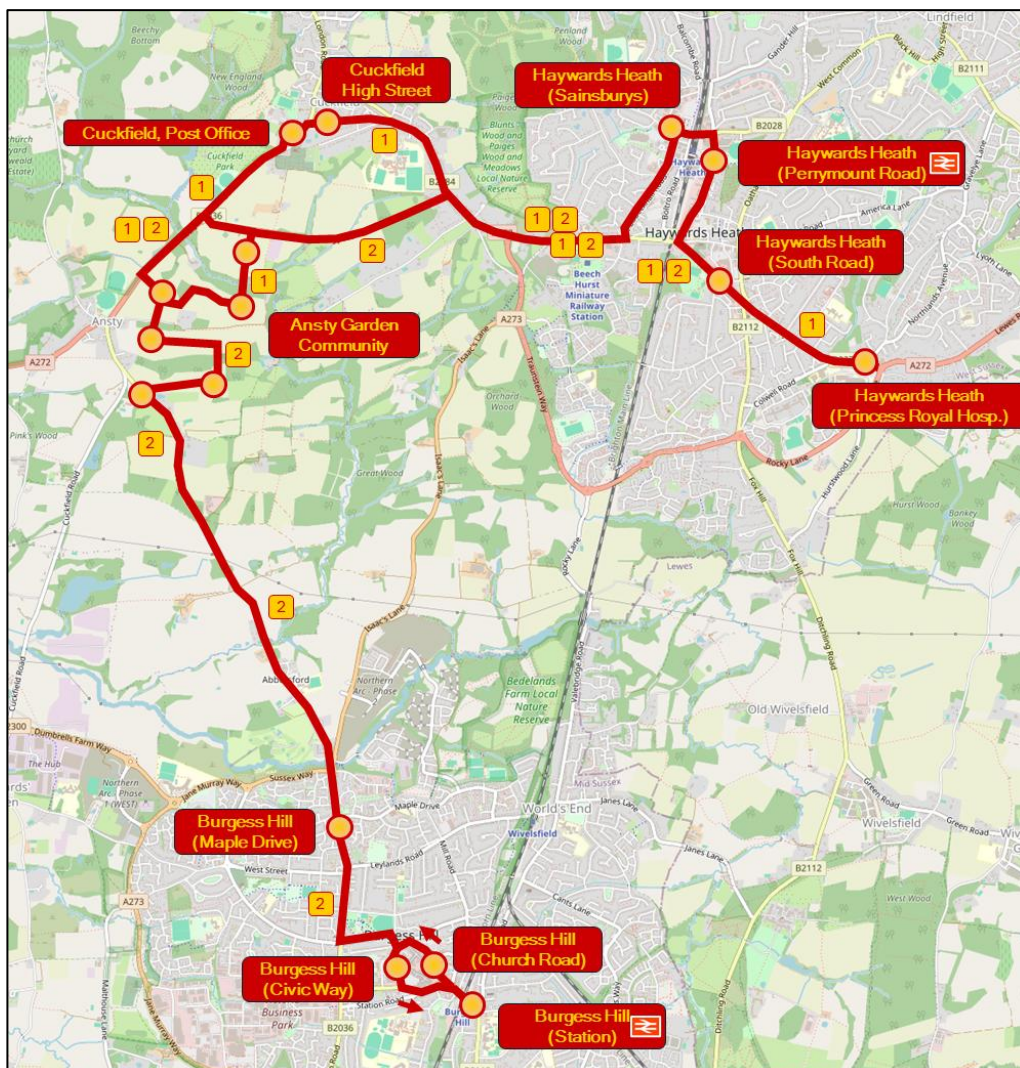


Bus Strategy Delivery Package

- 4.65 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.
- 4.66 To be secured by way of the S106 Legal Agreement, the Appellant is committed to supporting Bus Strategy package for a minimum of 2 years post the final residential occupation on the Appeal Site, as set out within para. 4.34 of the HSoCG (CD7.2).
- 4.67 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.

- 4.68 The Route 1 service (to / from Haywards Heath via Cuckfield) will be operational prior to the occupation of 50 dwellings, and the Appellant will continue to provide financial support to secure the running of the service for a minimum period of two years beyond the final residential occupation on the Appeal Site.
- 4.69 The Route 2 service (to / from Burgess Hill) will be operational prior to 30% occupation of dwellings, and the Appellant will continue to provide financial support to secure the running of the service for a minimum period of two years beyond the final residential occupation on the Appeal Site.
- 4.70 Figure 4.7 shows the intended routing of the Bus Service Strategy which highlights the principal stops on both routes serving Haywards Heath and Burgess Hill. This includes direct connections with the rail stations in both settlements as well as retail, employment and other town centre uses, including the hospital.

Figure 4.7 Bus Service Routing



4.71 Journey times between the Appeal Site and these key destinations are as follows:

- Cuckfield Post Office - 6 minutes
- Burgess Hill (Civic Drive) - 10 minutes
- Burgess Hill Rail Station - 12 minutes
- Haywards Heath (Sainsbury's) - 13 minutes
- Haywards Heath Rail Station - 15 minutes
- Haywards Heath (South Road) - 19 minutes
- Haywards Heath (Princess Royal Hospital) - 22 minutes

4.72 **Appendix MS3** to my proof of evidence further illustrates the proposed routing of the Bus Service Strategy, along with cumulative journey times from the Local Centre within the Appeal Site based on the aforementioned service frequencies, together with an 800-metre walk catchment from the proposed bus stops, consistent with the previously referenced '*comfortable walking distance*'.

4.73 **Appendix MS3** demonstrates that the Appeal Site would be well connected by sustainable transport modes and would enable future residents to access higher-order services and facilities, mainly located within Haywards Heath and Burgess Hill, without reliance on the private car.

4.74 In terms of access to education establishments, **Appendix MS3** demonstrates that the 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 75-metres east of the Academy entrance on the B2184. This provides future residents with an alternative choice of sustainable transport mode, over the aforementioned active travel modes, thereby meeting the requirements of paragraph 117 of the Framework.

4.75 In terms of further education establishments, **Appendix MS3** demonstrates that Haywards Heath College would also be readily accessible from the Appeal Site by sustainable transport modes. The College could be reached within approximately 20-minutes of the Local Centre via a bus journey to Haywards Heath Sainsbury's (circa 13-minutes), followed by a 450-metre (circa 7-minute) walk north-west along Harlands Road to the College entrance. Harlands Road benefits from wide, lit footways on both sides of the carriageway between Sainsbury's and the College, thereby providing a safe and attractive pedestrian environment for future residents.

- 4.76 In terms of employment opportunities, **Appendix MS3** demonstrates that Victoria Business Park, Sheddington Business Centre, and Bridge Road Industrial Estate would all be accessible from the Local Centre within approximately 30-minutes via proposed Bus Route 2. In addition, numerous healthcare facilities, including three GP surgeries, eight dental practices and Princess Royal Hospital, would also be accessible within a comparable journey time.
- 4.77 Given that both Haywards Heath and Burgess Hill would be accessible from the Appeal Site within approximately 30-minutes' cumulative journey time, as shown in **Appendix MS3** future residents would also have convenient access to a wide range of higher-order retail and leisure destinations, including supermarkets, comparison retail, restaurants, cafés, leisure facilities and town centre services.
- 4.78 In addition to the above, the proposed Bus Service Strategy would provide direct connectivity to both Haywards Heath and Burgess Hill rail stations. Allowing for a 10-minute connection time between the bus service and trains at both Haywards Heath and Burgess Hill stations, total journey times by public transport from the Appeal Site to wider destinations are as follows:
- Brighton - 34 minutes (via Burgess Hill)  
39 minutes (via Haywards Heath)
  - Lewes - 43 minutes (via Haywards Heath)
  - Gatwick Airport - 48 minutes (via Haywards Heath)
  - Worthing - 55 minutes (via Burgess Hill)
  - East Croydon - 56 minutes (via Haywards Heath)
  - Clapham Junction - 63 minutes (via Haywards Heath)
  - Eastbourne - 68 minutes (via Haywards Heath)
  - London Bridge - 69 minutes (via Haywards Heath)
  - London Victoria - 70 minutes (via Haywards Heath)
  - St Pancras International - 85 minutes (via Haywards Heath)
- 4.79 New bus stop infrastructure, both within the Appeal Site and on the A272 and B2036 corridors in vicinity of the Appeal Site, will be delivered in conjunction with the Bus Service Strategy. All residential dwellings within be within a 400m radius of bus stops.

- 4.80 Bus stops within the Appeal Site will be linked to the Mobility Hub network. The bus stop infrastructure will include waiting shelters with seating, flags, timetable information, accessible kerbing and bus cages, alongside safe crossing facilities for passengers to access active travel links.
- 4.81 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.
- 4.82 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.

#### Long-Term Viability of Bus Service Strategy

- 4.83 The sustainability of the Bus Service Strategy has been rigorously assessed through pre-application discussions between WSCC and the Appellant and is summarised in paras. 4.32 and 4.33 of the ACE Transport Addendum (May 2025) (CD2.11) and paras. 2.44 - 2.50 of the ACE Technical Transport Note #9, included as Appendix C to the ACE Transport Addendum.
- 4.84 Both documents confirm that an independent commercial sustainability assessment was conducted, the background of which was to demonstrate that the Bus Service Strategy was viable by full occupation of the Appeal Site with an interim level of financial support which is capable of supporting their introduction during the build-out period when, typically, the costs of providing the service outweighs the patronage and revenue.
- 4.85 The objective of supporting the Bus Service Strategy early on within the build-out of the development is to make travel choices available for residents as early as possible.
- 4.86 The independent commercial sustainability assessment was based on the following assumptions:
- 1) A build-out rate of 150 dwellings per year starting in 2026, for a construction period of 10 Years.
  - 2) The number of annual public transport trips being a product of the typical weekday number of public transport trips generated by the Appeal Site, multiplied by 260 working days, noting that the commercial sustainability calculations do not include a weekend service and should be considered robust in this regard.

- 3) Fare prices of £3 per trip, increased in line with year-on-year inflation sourced from Statista / ONS, noting that it is not clear what subsidy is provided / is to be provided in the future to bus operators to maintain the £3 fare cap. As such, revenue calculations should be considered robust.
- 4) Vehicle costs based on a 20-minute bus service between the Appeal Site and Haywards Heath & Burgess Hill, increased by year-on-year inflation as with fares.

4.87 Based on these assumptions, the independent commercial sustainability assessment indicated that the Bus Service Strategy would be expected to achieve commercial sustainability between year 5 and year 10 of the construction period, depending on bus uptake rates.

4.88 Compellingly, the independent commercial sustainability assessment indicates that there is a clear path to commercial sustainability for the proposed bus service, utilising robust assumptions in a number of aspects, well within the time period for commitment to supporting the Bus Service Strategy by the Appellant, and secured by the S106 Legal Agreement, as outlined in para. 4.66 of my evidence.

4.89 This directly addresses the concerns raised within the Parish Council's SoC, as outlined in Section 2 of my evidence, regarding the long-term viability of the Bus Service Strategy.

### Highway Infrastructure Package

4.90 The Highway Infrastructure Package for the Appeal Site is fully agreed with WSCC as Highway Authority. Alongside each phase of development, and in most cases, prior to the first occupation within that phase, the necessary connections to the local highway network and any triggered off-site highway mitigation are delivered to ensure that, at all times, the requirements of paragraphs 115 and 116 of the Framework are fully met.

4.91 Regarding the wider highway network, the Appellant has provided a detailed modelling evidence base that assesses the impact on the local highway network. As confirmed in the ACE Transport Addendum (May 2025) (CD2.11) the detailed modelling evidence base compellingly demonstrates that residual impact of the proposals would not be severe, having regard to the requirements of the Framework, under a 2039 future year forecast scenario with full development on the Appeal Site.

4.92 The Highways SoCG (CD7.2) confirms that this is agreed with WSCC subject to the delivery of off-site highway mitigation at:

- 1) The A272 / Tylers Green / Issac's Lane roundabout, as shown on ACE Plan 2207280-016C included within **Appendix MS2** of my evidence.
  - 2) Minor works to the B2036 London Road / Ardingly Road mini roundabout in Cuckfield, as shown on ACE Plan 2207280-002B included within **Appendix MS2** of my evidence.
  - 3) Widening of the western approach arm to the A272 / Bolney Road / B2036 mini roundabout in Ansty, as shown on ACE Plan 2207280-007D included within **Appendix MS2** of my evidence.
- 4.93 It is agreed that the Appellant will enter into a Section 278 Agreement with WSCC to implement the necessary mitigation works. Trigger points for the delivery of the off-site highway mitigation will be secured through the Section 106 Legal Agreement and a suitably worded Condition.
- 4.94 All off-site highway mitigation works will also be subject to the requisite Section 278 Highway Agreement with WSCC including the associated detailed design and technical approvals process. This will also secure any requirement for commuted sums to ensure that the Highway Infrastructure Package can be maintained in perpetuity for all users.
- 4.95 Should the Inspector be minded to grant permission, the Appellant is committed to ensuring that no more than 50% of the development is to be occupied until all off-site highway mitigation is completed to the satisfaction of the Highway Authority, WSCC.
- 4.96 In conjunction with the Highway Infrastructure Package, a suitable contribution from the Appellant will be secured through the S106 Legal Agreement to enable the necessary Traffic Regulation Orders ("TROs") to be progressed by WSCC to then implement revised speed limits on the highway network in the immediate vicinity of the Appeal Site.
- 4.97 The extent of the revised speed limits is shown in Figure 4.8 and comprises the following:
- B2036 Harvest Hill - reduction to 40mph speed limit
  - A272 - reduction to 50mph speed limit
  - B2036 South Street, Cuckfield - reduction to 30mph speed limit
- 4.98 It is agreed between the Appellant and WSCC that the TROs will be published and advertised prior to the commencement of development on the Appeal Site.
- 4.99 Speed limit changes will be implemented in agreement with WSCC prior to the first occupation of the development on the Appeal Site. Any associated works, including new signage, will be implemented by the Appellant in conjunction with the off-site highway mitigation.

Figure 4.8 Speed Limit Changes



- 4.100 The Appellant and WSCC agree that through the planning submission, a highway safety review was conducted across the road network study area. The review did not identify any pre-existing road safety deficiency or clusters of accidents that would either affect the consideration of the Appeal Site's off-site highway mitigation package or be materially worsened by the Appeal Site proposals.
- 4.101 All proposed highways works, including the site access designs and any off-site highway mitigation, have been the subject of an RSA1 and associated Designers Response for consideration at detailed design stage, as part of a Technical Approval process which will be overseen by WSCC, and will include further RSAs at the appropriate design, construction, and completion stages.
- 4.102 The Appellant and WSCC agree that, subject to the planning obligations and financial contributions identified, the Appeal Site proposals will not give rise to an unacceptable impact on highway safety, nor would to severe residual cumulative impacts on the road network, having regard to the Framework.
- 4.103 The Appellant and WSCC also agree that the planning obligations and financial contributions identified are 1) necessary to make the development acceptable in planning terms; 2) directly related to the development; and 3) fairly and reasonably related in scale and kind to the development, thereby meeting the statutory tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended).

## Trip Monitoring Strategy

- 4.104 The Appellant and WSCC have reached agreement on the implementation of a Trip Monitoring Strategy that, alongside the Travel Plan review process, scrutinises the successfulness, or otherwise, of the comprehensive package of active and sustainable transport interventions to be delivered by the Appeal Site in realising the vision-led approach of the development.
- 4.105 The Trip Monitoring Strategy will be a 'live' document linked and consistent with the Travel Plan Review process.
- 4.106 To be secured by way of the S106 Legal Agreement, the Appellant is committed to supporting Trip Monitoring Strategy for a minimum of 2 years post the final residential occupation on the Appeal Site, as set out within para. 4.29 of the HSoCG (CD7.2).
- 4.107 The Trip Monitoring Strategy builds upon the framework agreed between the Appellant and WSCC as set out within the ACE Transport Addendum (May 2025) (CD2.11) where, as a minimum, analysis of vehicular trip generation will be undertaken at the key milestones of 50% occupation, 75% occupation, 100% occupation and 2 years post the final occupation of dwellings on the Appeal Site.
- 4.108 To capture vehicular trip generation, Automatic Traffic Counter ("ATC") loops will be installed across the site access arms of each of the western, northern, and southern access roundabouts as they are constructed. The ATC loops will continuously collect data on traffic volumes entering and exiting the Appeal Site, by vehicle classification.
- 4.109 Data will then be stored within the associated monitoring equipment and will be available for extraction / analysis as part of any review conducted at the key milestones. The benefit of having access to continuous data is that there will be the opportunity to factor in variations such as weather conditions, seasonality (holiday periods) or the presence of highway maintenance works in the local area which could, to an extent, have an impact on the results.
- 4.110 This will be supplemented by peak hour multimodal surveys will be undertaken at each of the accesses to the residential parcels within the site, or a combination thereof that picks up all trip-making characteristics of the development to further inform the analysis within the Trip Monitoring Strategy.
- 4.111 An objective of these supplemental multimodal surveys will be to isolate the residential proposals and exclude all vehicular movements associated with other destinations. Thus, the methodology will reflect, for example, whether trips utilise links that cut through residential use to access the local centre or schools within the Appeal Site.

- 4.112 The results extracted from the ATC and multimodal surveys will provide an indication as to whether the vehicular trip generation is in accordance with the comparative baseline and forecast scenario(s), which, as set out in Table 4.5, are drawn from a combination of development-specific forecasts and established data sources for the local area (e.g. Census) and subsequently whether further mitigation is required.

**Table 4.5 Agreed Baseline Mode Split**

Peak Period	Walking	Cycling	Public Transport	Private Car	Other	Total
AM Peak	222	26	164	700	30	1,142
PM Peak	199	23	147	627	27	1,023
Daily	2,525	291	1,871	7,962	344	12,993
Mode Share	19.4%	2.2%	14.4%	61.3%	2.6%	100.0%

- 4.113 It is important to note that the proposed mode split target for a further 10% reduction in single occupancy car trips, as set out within the Framework Travel Plan, is in addition to and cumulative on the agreed baseline mode split.
- 4.114 These proposed mode split targets are suitability ambitious but are, importantly, deliverable and reflect the comprehensive package of infrastructure deliverables inherent to the Appeal Site proposals but also the full spectrum of commitments made by the Appellant within the FTP to a comprehensive package of measures and incentives made available to future residents and occupiers, that ensure the set targets are achieved.
- 4.115 Should vehicular traffic generation exceed the thresholds agreed in the Trip Monitoring Strategy then a process of implementing fallback mitigation is invoked, the details of which will be embodied within the S106 Legal Agreement.
- 4.116 As agreed between the Appellant and WSCC, the scale of exceedance may trigger the provision of additional travel vouchers and / or personalised travel planning to residents, or further off-site active enhancement up to a fixed value and agreed with WSCC, or provision of additional active and sustainable travel funding to WSCC.

## Travel Plan

- 4.117 The Framework Travel Plan (“FTP”) (CD2.36) prepared by ACE (May 2025) includes fully funded and deliverable measures and incentives that supplement the Active Travel Infrastructure and Bus Strategy delivery packages outlined earlier in my evidence, including:
- 1) The appointment of a Travel Plan Coordinator.
  - 2) The delivery of Travel Plan Marketing and Promotional measures comprising:
    - the establishment of a website.
    - cycle / walking activities.
    - a personalised travel planning service.
    - welcome packs for residents and employees.
    - provision of travel vouchers for each dwelling (to the value of £150).
  - 3) Mechanisms agreed with WSCC in relation to Travel Plan Monitoring including surveys and reporting.
  - 4) Mechanisms agreed with WSCC to deliver further remedial Travel Plan measures, if required, following review of the Travel Plan Monitoring reports.
- 4.118 The proposed targets contained within the FTP are agreed with WSCC, as outlined in paras. 4.26-4.27 of the HSoCG (CD7.2) and align with the ‘Monitor and Manage’ approach.
- 4.119 The suitably ambitious target for a 10% reduction in single occupancy vehicles is in addition to, and cumulative on, the baseline position in Table 4.3, which has already reflected the vehicular trip rate reduction factors agreed with WSCC.
- 4.120 Should the Inspector be minded to grant permission, the Appellant is committed to providing a full Travel Plan, aligning with the ‘Monitor and Manage’ approach, to be agreed in writing with WSCC / MSDC prior to first occupation on the Appeal Site, secured through the Section 106 Legal Agreement. The S106 Legal Agreement will also secure a commitment for the Appellant to fund WSCC Travel Plan Monitoring.
- 4.121 This commitment will provide further certainty on gateways through which to sanction targets, as well as set out the institutional framework for stewardship, including the appointment of a Travel Coordinator, as well as the Focus Group of Forum who would be responsible to agreeing how to use and monitor the measures and the use of the funding that would be put into the Travel Plan.

## 5. Conclusions

5.1 Should the Inspector be minded to grant permission, the Appeal Site will deliver a comprehensive, vision-led package of active travel, public transport and highways improvement strategies and measures that will have a direct and sustained long-term positive impact on the local community through a physical works secured by Conditions and far reaching financial support secured by way of S106 Legal Agreement.

5.2 The collective measures proposed in conjunction within the Appeal Site, which are also fully set out within the signed HSoCG, maximise opportunities for reducing the need to travel, especially by car. Such measures include:

- An extensive network of walking and cycling infrastructure within the Appeal Site that complies with LTN1/20 and connects via safe, prioritised crossing facilities with nearby settlements, services, and facilities, including Ansty, Cuckfield and Haywards Heath in accordance with the wider Mid Sussex Local Cycle and Walking Improvement Plan ("LCWIP") (March (2023)).
- Upgrades to the PRow network, to include works to Footpath 62CR to Bridleway specification and improved surfacing to Bridleway 67CR / 50bCU that deliver enhanced access to Warden Park Academy and Haywards Heath via Copyhold Lane.
- On-Site facilities and mixed uses including a primary school, SEND school, a health hub with GP surgery, a village centre with retail, employment and community uses, sports and recreational facilities. These comprehensive facilities will serve to reduce the need to travel and enable a proportion of development-related trips to be internalised.
- Cycle parking within the development in accordance with adopted standards.
- The delivery of Mobility HUBs within the development including provision for cycle hire / parking, real time information, package delivery lockers, and car club vehicles.
- 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.

- Bus stops within the Appeal Site that meet recognised walking catchments and are typically within 400m of all dwellings, where practicable.
- Speed limit reductions on the A272 and B2036 in the vicinity of the Appeal Site to enhance safety for active travel users traversing and crossing these road corridors.
- A Travel Plan and Trip Monitoring Strategy with commitments to achieve a 10% reduction in single occupancy car trips through a series of travel vouchers and other incentives as well as fallback mitigation measures if traffic thresholds are exceeded over a period up to two years post final residential occupation of the development.

5.3 Within my evidence I have demonstrated, contrary to the position set out within the Parish Council's SoC:

- 1) The Appeal Site delivers substantial Active Travel Infrastructure and Bus Strategy Delivery Packages.

Facilities, amenities, and local settlements will therefore be accessible by walking, wheeling, cycling and public transport, for all residents within the Appeal Site.

- 2) The Active Travel Infrastructure and Bus Strategy Delivery Packages alongside the Trip Monitoring Strategy and Travel Plan mechanisms / monitoring will be secured by S106 Legal Agreement and by Condition in relation to the submission of a Phasing Plan prior to the first Reserved Matters application.

This demonstrates the Appellants commitment to ensuring the timely delivery of infrastructure and securing sustainable access in the short term prior to first occupation of development.

5.4 I reach this position on the basis that:

- The Appeal Site, with current levels of infrastructure, is accessible by a choice of existing active travel routes and public transport services that provide connectivity to a range of local facilities, amenities and local settlements, being within reasonable walking and cycling distance of the local villages of Ansty and Cuckfield and within reasonable cycle distance to a wide range of retail, employment, education and leisure destinations, as well as major multi-modal transport hubs in Haywards Heath and Burgess Hill.

- By virtue of the extensive Active Travel Infrastructure and Bus Strategy delivery packages and the firm commitment given by the Appellant in regard to the implementation of a Trip Monitoring Strategy alongside Travel Plan measures / initiatives, secured by S106 Legal Agreement, modal shift towards sustainable transport modes is not only encouraged but, in my expert opinion, it will be realised.
- The Appeal Site will deliver 'step change' improvements to the local walking, wheeling, and cycling environment. These will not only enhance the quality and safety of the active travel route to local facilities / amenities for the benefit of future residents within the Appeal Site but will also provide measurable improvements for the residents within the existing local community surrounding the Appeal Site.
- An independent commercial sustainability assessment demonstrates that the long-term viability of the Bus Service Strategy is secure. Even with robust assumptions on potential revenue generated by the Appeal Site proposals and taking no account of any additional revenue generated from increased patronage en-route, the new services will be self-sustaining well in advance of the end stop date for financial support secured from the Appellant via the S106 Legal Agreement.
- The Appeal Site will not give rise to unacceptable impacts on highway safety or severe residual cumulative effects on the highway network in accordance with paragraph 116 of the NPPF.
- Throughout the phased development on the Appeal Site, and for a period 2 years post the final occupation, fallback mechanisms are in place, in agreement with WSCC and secured by S106 Legal Agreement, in the unlikely event that the robust mode share targets upon which the impacts of the Appeal Site proposals have been assessed.
- The package of vision-led mitigation measures, comprising targeted off-site highway works, active travel enhancements and public transport contributions, would provide effective and proportionate mitigation in accordance with paragraphs 115(d) and 116 of the NPPF.

5.5 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 paragraphs 110, 115 and 116 of the Framework.

5.6 In particular, the requirements of paragraph 110 of the Framework are met comprehensively in that the Appeal Site is sustainable and offers a genuine choice of transport modes.

- 5.7 Further, in respect to paragraph 115 of the Framework, it is demonstrated that the Appeal Site:
- Prioritises sustainable transport modes in the context of the vision, the type of development and its location.
  - Delivers safe and suitable access for all road users.
  - Considers the design of streets, parking areas, and other transport elements in accordance with the National Design Guide and the National Model Design Code, recognising that the material submitted with the Outline Application is illustrative.
  - Presents no significant impacts on the transport network, or on highway safety.
- 5.8 Indeed, in the context of part d) of paragraph 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.
- 5.9 Equally, under the requirements of paragraph 116 of the Framework, 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.
- 5.10 Based on the evidence provided in this Proof of Evidence, I therefore respectfully request that the Inspector allows this Appeal.