

Matter 4: Transport

Issue 1: Whether the Plan is justified, effective and consistent with national policy in relation to transport?

Q44. Is the Plan consistent with Circular 01/2022 Strategic Road Network and the Delivery of Sustainable Development and paragraphs 104 – 109 of the Framework? How has the Council considered transport issues from the earliest stages of plan making and development proposals particularly given the opportunities to maximise sustainable transport solutions may vary between urban and rural areas?

44.1 Consistent with the objectives of both the Circular and Framework, MSDC has developed a vision-led approach to transport matters. The development of the transport evidence base, underpinned by the Stages 1-6 of the Mid Sussex District Council Transport Study (TS) and summarised in the Mid Sussex Transport Model Assumptions (June 2024) note, has been an iterative process whereby the management of transport impacts have been directed by two key objectives – i) to minimise the impact of development through encouraging sustainable travel and ii) where network capacity intervention is required, to direct traffic towards the primary road network where residual junction capacity can be used to accommodate the traffic impact or where the impacts of development traffic are less than 'severe', in accordance with the requirements of the Framework.

44.2 The approach to transport mitigation adopted by the Council to tackle the impacts arising from development has, from the outset, been focussed on managing them without comprehensive network capacity intervention. Within this, Site Promoters have been tasked with developing site-specific strategies to encourage the uptake of sustainable travel in accordance with the nature and location of the site from the outset of the Plan process. Wates Development Limited has prepared bespoke Mobility Strategies where the transport initiatives reflect the area in which the site is located –. These Mobility Strategies form the basis of the sustainable travel package that will accompany future planning applications in order to realise the vision established through the MSDC TS and are continually evolving documents designed to maximise the opportunities as the planned development sites progress through planning.

Q45. Following the Regulation 19 consultation on the Plan which is the subject of the examination, National Highways determined that due to potential severe impacts on the Strategic Road Network (the M23 and A23) the Council would either have to a) consider a different pattern of growth; b) commit to significant highway improvements to the M23 and A23; or c) commit to a more ambitious package of sustainable transport, travel demand management and behaviour change measures and interventions accompanied by a robust 'monitor and manage' strategy and approach. What has been the Council's response to this? Are any consequential main modifications required to the spatial strategy, policies and timing of delivery of development over the lifetime of the development plan?

45.1 While a matter for MSDC to respond to, it is noted that there has been ongoing dialogue between MSDC and NH in regard to the work being undertaken to assess and mitigate transport impacts, culminating in a Memorandum of Understanding (July 2024) in which the scope of the outstanding assessment and mitigation identification has narrowed considerably from the response provided at Regulation 19.

45.2 The A23/M23 corridor bisects the district and, regardless of the spatial strategy applied, planned growth will inevitably route towards and use the Strategic Road Network given its proximity to potential growth areas within the district. The assessments undertaken to date through the MSDC TS have not identified a 'severe' impact occurring on the SRN. Further assessment, in the form of 'Mid Sussex M23 and A23 Merge and Diverge' (September 2024) assessment identified that upgrades will be required at three locations (A23 / B2118 north and southbound, and the A23 / A272 southbound), comprising modest widening and resurfacing to upgrade the form of the slip. These works can be accommodated within the highway and do not require third party land.

45.3 The completion of the Merge and Diverge Assessment and identification of mitigation requirements will enable the identification of the cost of implementing the schemes, and the subsequent apportionment of costs through the IDP or through an updated SDP (see 48.2).

Q23. Is the transport evidence which supports the submission plan including any assumptions, such as home working rates, robust, justified and is consistent with national policy.

46.1 The various iterations of the MSDC TS have taken an evidence-led approach to the consideration to trip rate reductions. The Mid Sussex Transport Model Assumptions Note (June 2024) sets out the reductions applied to the trip rates and the approach taken in the modelling of the planned growth strategy in the most recent iteration of the MSDC TS.

46.2 The assumptions made have been justified through a range of datasets including the Mid Sussex Economic Growth Assessment and transport evidence bases / studies from other regions within the UK including that of neighbouring Districts of Horsham and Crawley. This approach enables the evidence to be consistent with neighbouring Districts and to draw upon best practice from other locations within the UK. The trip rate reductions applied through this evidence, set out in detail within Section 3 of the MSDC TS Stage 5, are justified and consistent with national guidance for the assessment of transport impacts. They reflect changes to travel behaviour that has occurred following the Covid pandemic and represent logical reductions for cross visitation between uses such as education sites and residential dwellings.

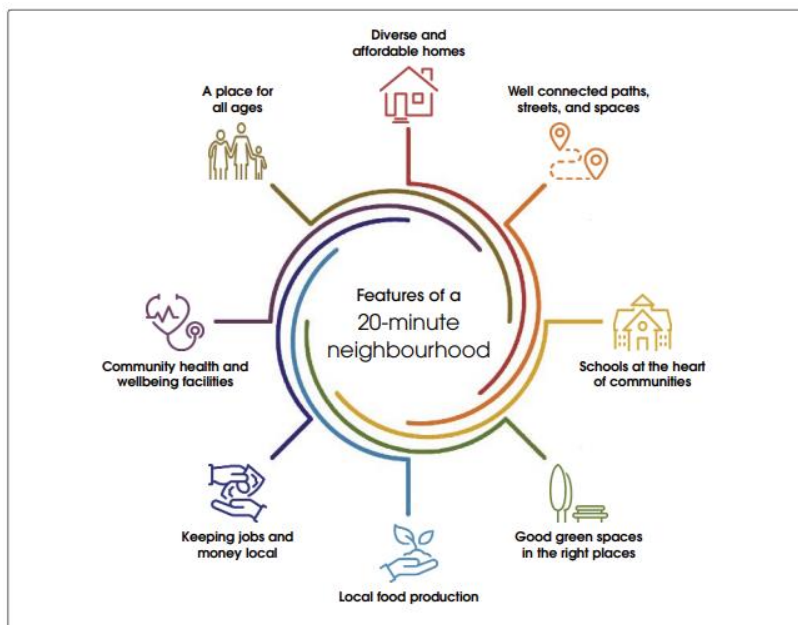
46.2 In the interests of robustness, many of the reductions applied by MSDC err on the side of caution. During early engagement with Site Promoters while developing the evidence base, a rigorous examination of the parameters used to inform the MSDC TS was undertaken, with particular focus on the trip rates used and the allowances that should be made. The Wates Developments Limited recommendation was that a lower trip rate should be utilised, and its analysis concluded that the parameters used to inform the TS would likely overestimate the impact of planned development. While some adjustments have been made, as reflected in Section 3 of the MSDC TS, there are areas where further, realistic, reductions could be made – for example, retail uses generate very few 'new' movements on the network and retail trips often form part of a multiple purpose journey. However, the transport evidence applies only a 5% reduction to these trips. This caution provides reassurance that the evidence provides for a robust assessment of the traffic impacts associated with planned growth, and that the measures that will be adopted will address the impacts identified.

Q47. Specifically, to what extent is the central tenet of the Plan, of 20-minute neighbourhoods and local living, justified, and effective in the context of a predominantly rural district and a development strategy which is to identify sites in areas which are to improve the sustainability of existing settlements including those falling within lower tier categories? Is there a tension between substantial low-density development as reference in the Local Plan Viability Study (VA) (IV2) and a successful 20-minute neighbourhood?

47.1 The concept of a 20-minute neighbourhood is a vision for creating sustainable places – the development of transport evidence that has its roots in a vision-based approach advocated in guidance documents such as Circular 01/2022, and justifiable on the basis that Plans and transport strategies, should be forward thinking to create places of the future.

47.2 While the measures that can be utilised in predominantly rural districts will inevitably vary from those utilised in more densely populated urban locations, this does not preclude the application of 20-minute principles even to smaller, more rural sites. Fundamentally, it does not alter the soundness of the transport evidence, which is tailored to reflect the impact of changes to the network with the vision directing what and how the changes should be provided for.

47.3 The features of a 20-minute neighbourhood are achievable and policy allowances have been made across the Plan to allow for these key concepts to be captured in development proposals:



47.4 Plan and site-specific policies incorporate infrastructure requirements such as the provision of new schools or education facilities within the heart of the identified Significant Sites, along with the provision of diverse and affordable homes, green spaces, community facilities and well-connected streets and spaces.

47.5 The success of the 20-minute neighbourhood in village locations will not occur immediately as the constraints of village living are such that such locations may not become true 20-minute neighbourhoods. However, the soundness of the Plan is not predicated on this being realised – rather, it sets a transport vision as to how development should be delivered and sets a tone that village development should not be isolated enclaves but interconnected with the community to achieve mutual benefit.

Q48. What mechanisms would be required to achieve the proposed improvements set out within the individual allocations and would they be enough to prevent the transport impacts identified? Would the delivery of the sites be viable so as to be able to support the required mitigation requirements over the long term? Is the cost of any mitigation requirements reflect in the VA. Moreover, would these sites become genuinely sustainable, or given their locations, would they remain heavily reliant on the private car? For example, I note that the cycle routes within the identified Sustainable Communities sites would only lead to a reduction in highway traffic of 1-2%?

48.1 Combinations of Developer delivery, secured by Section 106 Agreement, and authority-led Delivery facilitated by financial contributions have proven to be a successful means of enabling development to take place while securing the timely delivery of infrastructure.

48.2 The 'Mid Sussex Infrastructure and Development Contributions SPD' was adopted in 2018. Appendix 5 of the draft submission version of the MSLP sets out that the SPD will be superseded by adoption of the MSLP. To facilitate fair and equitable contributions towards the delivery of strategic infrastructure improvements, the adopted Supplementary Planning Document should be updated and incorporate the apportionment of costs derived from the Apportionment Study referenced on page 5 of the Memorandum of Understanding (July 2024) between MSDC and NH. This will ensure that any financial contributions secured by planning obligation can satisfy the requirements of CIL Reg 122. This update should be completed alongside the MSLP process and in place by the time the MSLP is adopted. It should also take into account any viability matters made at the EiP and within the MSLP evidence base.

48.3 More rural locations may create a greater dependency on private vehicles than an equivalent city centre location. However, the spatial strategy promoted in the Plan supports the continued vitality of village locations by locating development where infrastructure investment can benefit existing communities and provide greater opportunities for modal shift – a vision for 20-minute neighbourhoods leans into this, encouraging connectivity and achieving infrastructure gains at a local level as opposed to network capacity investment at congested, city centre locations which are already subject to significant levels of capital investment.

48.4 In modal shift terms, a reduction in highway traffic of 1-2% is a significant gain. This is the uptake of cycling by many users who would not have ordinarily cycled as a first choice, who have been transferred to cycle journeys through the provision of infrastructure and initiatives. Development traffic typically increases network flows by less than 5% and, on high traffic roads, this number is often lower. A 1% -2% modal shift of existing network traffic offsets a significant proportion of the traffic growth attributed to development. Combined with other measures such as the operation of Travel Plans, investment into public transport, the

use of technological advancement and the delivery of Car Clubs, modal shift plays an important role in mitigating traffic growth.

Q49. National Highways is clear that Road Investment Strategy (RIS) funding would not be available. What certainty is there that sufficient mitigation would be capable of being achieved either through the reduction of private car journeys or funded highway improvements? How could the 'monitor and manage' approach be integrated into the Plan and how would it impact on its deliverability?

49.1 Stages 5 and 6 of the MSDC TS identified no 'severe' impacts on the transport network beyond three locations located on the local highway network. While the MoU between MSDC and NH suggests further assessment is being undertaken, it is reasonable to conclude that the outputs of this assessment will not be materially different to that from the previous iterations of MSDC TS. As such, it is unlikely that there will be the requirement for large scale strategic infrastructure improvements along the SRN corridor that would require significant levels of alternative funding (e.g. RIS).

49.2 To date, the evolving mitigation strategy within the MSDC TS focusses on measures to encourage sustainable travel, well within the scope of works that would be expected to be delivered from development proposals, alongside 'soft' measures such as the delivery of Car Clubs and enhancement of bus services. This collaborative approach, which involves working alongside commercial partners, enables contributions to be used effectively to allow for the long term commercial operation of services and measures, reducing the impact on site viability.

49.3 While a finalised package of works to mitigate the remaining impacts of the planned growth has yet to be identified, Wates Developments Ltd has commenced its own assessment of the possible network capacity improvements, should they be required, to mitigate the impacts of planned growth. Consistent with the outputs of the Mid Sussex M23 and A23 Merge and Diverge Assessment, these local network improvements represent smaller scale interventions, primarily limited to geometric enhancements as opposed to significant reconstruction or reconfiguration of the junctions. Pre-application scoping is being progressed with the highway authority to set the scope of the Transport Assessments that will be required to accompany future planning applications.

49.4 In the event that the Plan is found sound, and in the absence of a defined package of transport mitigation, a 'Monitor and Manage' approach could be utilised. This could comprise a vehicle trip budget, formed of financial contributions from development based on a reasonable worst-case scenario. This budget could be administered by a body of consultees – e.g. District Council, local highway authority, strategic highway authority and site promoters. The performance of the network would be monitored and, where appropriate, intervention be made to address issues within the highway. Where forecast effects do not occur, this will enable unnecessary planned works to be postponed / cancelled in favour of flexible and agile management of the network.

49.5 To secure a Monitor and Management approach, site specific policy could be introduced that requires Developers to submit a 'Vision and Validate' and 'Monitor and Manage' strategy. This would build upon the Mobility Strategies prepared as part of the development of the MSLP evidence base, and the subsequent assessments undertaken as

part of the Transport Assessments that would be expected to accompany planning submissions. Such an approach to Monitor and Manage has been introduced successfully within the Maidstone Local Plan Review and forms a key component of site-specific policies.

Q50. Taken together, are the policies of the Plan including the site allocations and policies DPT1; Placemaking and Connectivity, DPT2: Rights of Way and Other Recreational Routes, DPT3: Active and Sustainable Travel together with DPI1: Infrastructure Provision, DPI2: Planning Obligation, DP13: Major Infrastructure Projects and DP18: Viability justified, effective and consistent with national policy in relation to transport so as to avoid unacceptable impact on highway safety? Would they ensure that the residual cumulative impacts on the road network would not be severe? How would the Infrastructure Delivery Plan be effective in supporting the above policy requires?

50.1 Yes. The policies come together to provide a consistent approach to transport, with a strong emphasis on modal shift and the enhancement of sustainable transport given the nature and context of the local area, in accordance with the objectives of the Framework. There is an emphasis in both the policies and the supporting evidence that the Council is focussing their efforts away from a programme of network capacity interventions in favour of a sustainable strategy that will benefit both new residents and the communities in which the developments are situated.

50.2 While the IDP plays an important role in identifying infrastructure required to support development, the rapidly changing nature of travel behaviour and advancements in technology can quickly render a strategy that may be suitable now as unsuitable for the needs of 2039. A Monitor and Manage approach, as set out in 49.4 and 49.5, may be a more suitable approach to enabling the Plan to succeed on its objectives and, importantly, delivering infrastructure that is both appropriate and beneficial to the growth of the district while mitigating the impacts of development.

Q51. Are any main modifications necessary for soundness, if so, why?

No comment