

Mid Sussex District Council

District Plan Review

Matters, Issues and Questions – Stage 1

Matter 4: Transport

September 2024



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

44. 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 that opportunities to maximise sustainable transport solutions may vary between urban and rural areas?

The Plan is consistent with Circular 01/2002 and Paragraphs 104 – 109 of the Framework.

- 44.1. From the outset of the Plan making process, the Council has taken into account transport issues. The approach taken by the Council seeks to facilitate a reduction in the need to travel by private car, focusing development on locations that are or can be made sustainable. In line with the adopted West Sussex County Council Local Transport Plan (2022-2036) [T14], it is moving towards a vision-based approach to transport planning and has sought to prioritise the development of sustainable transport solutions that reflect the rural nature of the district. As confirmed in the Memorandum of Understanding (MoU) with National Highways (NH) [DC17] and West Sussex County Council Highway Authority (WSCC HA) [DC14] and the Statement of Common Ground (SoCG) prepared with WSCC HA [DC15] and the SoCG which is in preparation with NH, the transport evidence has been developed in accordance with Circular 01/2022.
- 44.2. The MSDC Transport Study [T9] tests 6 development scenarios (results for Scenarios 3 – 6 are published), which test the potential impacts of the Plan on the transport network, from the earliest stages of the plan making process and throughout the development of the Plan. The Site Selection Methodology [SSP1] explains the robust and transparent site assessment process, which informed the Plan strategy and site allocations. The site selection process was developed to determine the most sustainable and developable sites, which ensured that site selection was consistent with the principles of sustainable development and consistent with the policies in the NPPF.
- 44.3. Stage 2 of the Site Selection process excluded those sites that would not contribute to a sustainable pattern of development. The sites were excluded where they would have little or no access to public transport and would be reliant on private cars to access services. It was considered that these sites would not represent sustainable development as set out in the NPPF. This approach recognises the rural nature of Mid Sussex and prevents development that is isolated and disconnected from

existing settlements, and acknowledges that small, isolated sites would not be able to deliver sufficient infrastructure to support the day to day needs of the community and limit the need to travel, or be capable of offering a genuine choice of transport modes, as required by NPPF, para 105. This approach is explained in detail in [\[SSP1\]](#) paragraphs 20 – 24.

- 44.4. The Site Selection Conclusions Paper [\[SSP2\]](#), section 3, explains how the pool of 270 sites identified in the Strategic Housing Land Availability assessment were refined to a pool of 170, with 100 sites rejected at the first stage.
- 44.5. In contrast, [\[SSP1\]](#) recognises that “sites of a significant scale can act as ‘stand-alone’ settlements supported by on-site infrastructure and services which could enable them to be self-sufficient and deliver sustainable places ([\[SSP1\]](#), paragraph 22). Therefore, specific consideration was given to sites proposing a yield of 1,000 dwellings of more, known as Significant Sites. This is consistent with the NPPF, Paragraph 105, which states “significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”.
- 44.6. The assessment of Significant Sites is explained further in [\[SSP2\]](#) at paragraphs 3.3 – 3.38 and sets out the types of infrastructure, mix of uses and community facilities on-site. Policy requirements have been developed in consultation with the Significant Site promoters and stake holders such as West Sussex County Council, to ensure each development makes provision for essential infrastructure. Each development includes a mix of uses with a neighbourhood centre to support the day to day needs to the community without the need to travel significant distances, and a transport hub to support sustainable travel, all within a layout which prioritises active and sustainable travel in accordance with paragraph 105 of the NPPF.
- 44.7. In consultation with WSCC HA, the Significant Site promoters have developed site specific Mobility Strategies ([Site Allocations Evidence Library](#)) which detail the sustainable travel strategy for delivery on the site. Each site has engaged with WSCC HA and transport infrastructure providers including local bus providers, car / bike share / hire businesses to develop a package of sustainable travel schemes to demonstrate they are deliverable. The council has actively engaged with neighbouring authorities through the Duty to Cooperate to help refine the transport evidence and policies in the Plan in accordance with paragraph 106 of the NPPF.

45. 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 the 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?

Since the Regulation 19 consultation the Council has continued to engage with National Highways, to resolve those matters raised in its representation. Considerable progress has been made and a Memorandum of Understanding was submitted into the Examination in July, which sets out the parameters of further work that will be undertaken by the Council. Since July, these work streams have been actioned and results shared with NH. It is anticipated that the Council will enter into a Statement of Common Ground, prior to the commencement of the hearing session in October.

45.1. Following the Regulation 19 consultation, Mid Sussex District Council (MSDC) and National Highways (NH) prepared and agreed a Memorandum of Understanding (MOU) [DC17] which sets out the position as at July 2024 – that NH have informed and validated development of the Mid Sussex Strategic Transport Model in line with standard good practice as set out in the Department for Transport’s (DfT) Circular 01/2022 and transport analysis guidance (TAG). It also sets out the subsequent strategic and local junction modelling and Merge Diverge Assessment on the A23/M23 (also in line with standard good practice as set out in the Department for Transport’s (DfT) Circular 01/2022) which is currently ongoing. Further to the MOU, a Statement of Common Ground (SoCG) is being prepared with NH to provide a further update on the work that is ongoing.

45.2. The SoCG will set out that significant progress has been made with the development of further evidence to demonstrate the potential impacts on the Strategic Road Network (A23/M23) with four meetings been held since the beginning of July 2024. The Merge Diverge Assessment [T11] identifies five locations (see paragraph 5.2.7), out of a total of nineteen tested, where impacts associated with the Plan, when compared to the Reference Case, cause the total traffic flows to exceed the design capacity of the existing layout. Chapter 4 of the Merge Diverge Assessment [T11] presents the evidence to demonstrate how impacts have been mitigated to a level not considered ‘severe’ as per the definition of the NPPF. Proposed interventions have been prepared and costed and in

principle agreed for 3 merge / diverges on the Strategic Road Network at the A23/B2118 Northbound merge, the A23/B2117 Southbound merge and the A23/A272 Southbound merge. It has been agreed that due to physical constraints, improvement measures at the A23/B2115 Southbound on slip merge and the A23/A272 Northbound off slip diverge are impracticable, however the assessment concludes that the impact associated with the Plan would not be 'severe' in terms of the definition set out within the NPPF.

- 45.3. At the time of drafting, work is continuing in respect of safety impacts where NH consider the evidence indicates an increased safety risk. NH acknowledge that many of these locations are substandard in both the Reference Case and the Local Plan scenarios. A mitigation scheme has been agreed in principle as feasible at one of the ten locations (A23/A272 Southbound on slip merge) which has now been prepared and costed and identified in the Infrastructure Delivery Plan [IV4]. MSDC are continuing to work with NH to develop the evidence base and agree a position in respect to safety which is proportionate. Work includes taking account of Covid implications to determine a more accurate background growth when compared with the 2019 base year.
- 45.4. The evidence confirms that the impacts identified are not associated with one single site allocation and no 'showstoppers' have been identified i.e. no issues arise which are a direct conflict with policies to the extent that sites would need to be removed from the Plan. As such, no modifications to remove any site from the Plan are justified. There is also no evidence to suggest that it is necessary to control the timing of delivery of development through a main modification.
- 45.5. Main Modifications [DP2] have been proposed by the Council to ensure clarity on the mechanisms to deliver the vision-based development in the Submitted District Plan [DP1]. The Council has proposed Main Modification reference M52, M53, M54 to the policy and supporting text of **Policy DPT1: Placemaking and Connectivity**, in combination with Main Modification reference M128, which relate in the Plan to the 'monitor and manage' strategy, an approach (compliant with Circular 01/2022) which will be used to monitor the delivery of the development in the Plan to determine actual demand on the network and deliver the most effective mitigation. The Plan confirms that the Council will convene a (nominally titled) Transport Infrastructure Management Group (which include West Sussex County Council (WSSCC) and NH (as appropriate)) who will keep the effectiveness, deliverability and phasing of the transport infrastructure projects required to deliver the Plan strategy under review, as part of a 'monitor and manage' process. This approach has been agreed by WSSCC, as set out in the SoCG [DC15] between MSDC and WSSCC.
- 45.6. The Council is content that the Plan and its policies are sufficiently robust, and the required mitigation has been designed, costed and apportioned, and is identified in the Infrastructure Delivery Plan (IDP) [IV4]. These costs have also been tested in the update to the Viability Study [IV5].

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

The transport evidence, including any assumptions such as home working rates, which supports the Submitted District Plan [DP1] is robust, justified and consistent with national policy.

- 46.1. As part of the Transport Study [T9] and in response to the National Highways (NH) Regulation 19 representation, a Model Assumptions Note [T13] has been produced which sets out the reasoned justification behind the key modelling assumptions relating to TRICS Trip Rates, mode shift assumptions for home working, internalisation and distance based trip reductions, along with sustainable travel measures proposed for Significant Sites and future employment distribution and location and proximity to existing services.
- 46.2. The Transport Study [T9] undertakes analysis of the impacts of the Local Plan scenario on the local and strategic road network up to the end of the Plan period. A strategic highway model has been developed to test a series of development scenarios. The modelling incorporates the key assumptions as set out in the Model Assumptions Note [T13], including those around home working, which have been developed in consultation with and validated by WSCC as being robust and justified. In line with national policy, the transport evidence base moves away from transport planning based on predicted future demand, and instead towards a vision-based approach which sets agreed outcomes communities want to achieve and provides transport solutions to deliver those outcomes.
- 46.3. The evidence, has, therefore been developed on the basis of a 'worst case' which includes higher background growth (Scenario 5 – 'sensitivity') along with a more realistic/ optimistic case for background growth (Scenario 6 – 'core') taking into account Covid impacts when compared to the 2019 base year. It includes robust and justified assumptions including home working and internalisation on the site allocations. This approach seeks to ensure that the Plan mitigation is effective and does not overprovide capacity improvements on the network which could lead to further compounding issues of car dependency and use. The 'Core' scenario is compliant with the requirements of Circular 01/2022 regarding the assessment of residual traffic impacts via the 'vision and validate' approach, which is to be delivered over the lifetime of the Plan via the monitor and manage strategy and the mobility strategies for significant sites.
- 46.4. The modelling assumptions applied Scenarios 5 and 6 have been informed and validated by both NH and WSCC. This is recorded in the Memorandums of Understanding (MOU) prepared and agreed between Mid Sussex District Council (MSDC) and NH [DC17] and WSCC [DC14]. Further to the MOUs, a Statement of Common Ground (SoCG) has been prepared between MSDC and WSCC [DC15] and is being prepared between MSDC and NH to provide an update on the further work that is ongoing.

47. 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 referenced in the Local Plan Viability Study (VA) (IV2) and a successful 20-minute neighbourhood?

The concept of '20-minute Neighbourhoods' and 'local living' is a justified and effective guiding principle for development in Mid Sussex. The strategy which allocates sites in areas where sustainability can be improved, to the benefit of existing and future residents, will contribute to the overarching sustainability objectives of the Plan.

- 47.1. Strategic Objective 12 of the Submitted District Plan [DP1] supports sustainable communities which embody the 20-minute neighbourhood principles. The Plan aligns with the concept of '20-minute neighbourhoods' and 'local living' which is a term used in the adopted West Sussex County Council Local Transport Plan (2022-2036) [T14]. It is about moving towards a vision-based approach to transport planning and has sought to prioritise the development of sustainable transport solutions that reflect the predominantly rural nature of the district. It encompasses guiding principles of good design to deliver mixed-use schemes and walkable communities which provide for day to day needs within easy walking/ cycling distances. Principles and policy requirements in the Plan will be applied on a proportionate basis and will be dependent on the scale of the proposal and its location and specific context.
- 47.2. With regards to lower tier settlements, whilst Sayers Common is currently a lower tier settlement, the palette of sites which make up the proposed allocation will enable Sayers Common to become sustainable. The step change in growth that will come with the delivery of this allocation will mean that on completion, Sayers Common will no longer function as a lower tier settlement.
- 47.3. Due to the availability of sites, the Council has been creative in its approach in order to meet the objectively assessed housing need and to look beyond constraints and barriers to development in lower tier settlements. The approach has been tested through the Sustainability Appraisal (SA) process and the SA demonstrates that this is a sustainable approach to growth in Mid Sussex.
- 47.4. This approach is consistent with the NPPF, Paragraph 105, which states that "significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of

transport modes". The evidence demonstrates this is a justified and effective approach to growth.

There is no tension between substantial low-density development as referenced in the Local Plan Viability Study (VA) (IV2) and a successful 20-minute neighbourhood. The density assumptions in the Viability Study were for the specific purpose of informing the viability assessment, rather than a reflection of actual densities planned for specific sites or the ability of sites to deliver at a density required to achieve a successful 20-minute neighbourhood.

- 47.5. Density referred to in the Viability Study [\[IV2\]](#) at 30 dwellings per hectare (dph) is based on a high-level assessment of the whole site, without removing any undevelopable areas such as green infrastructure and areas of flood risk. The master planning of specific greenfield sites ([Site Allocations Evidence Library](#)) has confirmed that when taking account of the developable areas only, development density will be higher and development more compact. In addition, the Mid Sussex Design Guide SPD [\[O3\]](#) sets out guiding principles for higher density/more compact development in new developments around neighbourhood centres whilst allowing for lower density development in the peripheral areas adjacent to the countryside. As such, the assumption of 30 dph overall remains robust.

48. 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 reflected 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%?

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?

There are a number of mechanisms to ensure the proposed improvements set out within the individual allocations are achieved and that they are enough to prevent the identified transport impacts.

- 48.1. The MSDC Transport Study [\[T9\]](#) has tested numerous development scenarios, which have tested the potential impacts of the Plan on the transport network. Any

required mitigation identified through the transport work has been designed, costed and apportioned, and is identified in the Infrastructure Delivery Plan (IDP) [IV4]. These costs have also been tested through the update to the Viability Study [IV5].

- 48.2. In addition, work has been progressing with the three significant site promoters to develop site specific Mobility Strategies ([Site Allocations Evidence Library](#)). The Mobility Strategies are a key element of the mitigation and provide the evidence of feasibility and deliverability of sustainable travel measures to assist in achieving a reduction in private car journeys. Evidence of cost has been developed and taken into account in the update to the Viability Study [IV5].
- 48.3. The policy requirements of **DPT1: Placemaking and connectivity**, at the planning application stage, require developments that are likely to generate significant amounts of movement and / or have a significant impact on the transport network to provide a Transport Assessment, Sustainable Transport Strategy and Travel Plan. This will identify appropriate mitigation and to demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it.
- 48.4. The Council has proposed Main Modifications references M52, M53, M54 and M128 [DP2] in relation to a 'monitor and manage' approach. The Plan sets out commitment to deliver growth supported by the 'monitor and manage' approach which will review the actual demand on the network and the mitigation requirements. It commits the Council to convening a (nominally titled) Transport Infrastructure Management Group (which include West Sussex County Council (WSCC) and NH (as appropriate) to keep the effectiveness, deliverability and phasing of the transport infrastructure projects required to deliver the District Plan strategy under review, as part of a 'monitor and manage' process. This approach has been agreed by WSCC, as set out in the SoCG [DC15] between MSDC and WSCC.

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 reflected in the VA.

- 48.5. Work with the Significant Site promoters has included an assessment of the feasibility of costs associated with delivery of their strategies.
- 48.6. For the purposes of the Viability Study [IV2] S106 costs have been estimated using the [WSCC S106 calculator for Mid Sussex](#) which includes infrastructure contributions along with sustainable transport contributions (also known as Total Access Demand (TAD) Contribution), the latter of which accounts for the costs of delivering the mobility strategy schemes in high level terms.
- 48.7. The infrastructure costs for sustainable travel mitigation and strategic highway mitigation schemes have been updated along with all other IDP/ S106 costs, shared with the site promoters and have been reconsidered in the update to the Viability Study [IV5]. The note confirms that the 2022 Viability Study is robust, and the significant sites are viable taking account of the updated costs.

Would these sites become genuinely sustainable, or given their locations, would they remain heavily reliant on the private car?

- 48.8. The proposed site allocations will deliver sustainable communities which are either supported by existing/ improved infrastructure where connected to an existing settlement or are of a scale that can support delivery of a community including a mix of uses/ opportunities for employment and necessary infrastructure to be able to support the day to day needs to the occupants, without the need to travel long distances. In a rural context, it is anticipated that the need to travel by car will remain a key and predominant percentage of mode share and the Transport Study [T9] has accurately assessed this likelihood with relatively modest assumptions in terms of sustainable travel mode share. A package of mitigation measures has been designed, costed and agreed in principle in this regard.
- 48.9. These assumptions have taken into account the rural nature of the district and mitigation has been designed and costed accordingly. As set out above, effective delivery of the package of measures will be determined by the 'monitor and manage' approach which will be used to monitor the delivery of the development in the Plan to determine actual demand on the network and deliver the most effective mitigation. The Plan confirms that the Council will convene a (nominally titled) Transport and Infrastructure Management Group (which includes West Sussex County Council (WSCC) and NH (as appropriate)) who will keep the effectiveness, deliverability and phasing of the transport infrastructure projects required to deliver the Plan strategy under review, as part of a 'monitor and manage' process. This approach has been agreed by WSCC, as set out in the SoCG [DC15] between MSDC and WSCC.
- 48.10. This is consistent with the NPPF, Paragraph 105, which states "significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."
- 48.11. The Council has proposed Modifications M52, M53, M54 and M128 [DP2] to this effect, along with Modifications M55 and M58 relating to WSCC representations on the provision of active travel infrastructure, and this approach has been agreed by WSCC, as set out in the SoCG [DC15] between MSDC and WSCC.

49. 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?

Sufficient mitigation is capable of being achieved through a combination of a reduction in private car journeys and, where necessary, delivery of funded highway improvements.

- 49.1. In accordance with the WSCC Local Transport Plan [T14], sustainable mitigation has been prioritised in order to reduce the number of private car journeys from the sites, as described in the Model Assumptions Note [T13]. Existing and proposed sustainable travel networks and schemes have been taken into account in the modelling, including relevant projects identified in the MSDC Local Cycling Walking Infrastructure Plan (LCWIP) [T12], in combination with proposed promoter schemes (modelled in Scenarios 5m4 and 6m4).
- 49.2. In respect of the significant site schemes, since Regulation 18, work has been progressing with the promoters to develop site specific Mobility Strategies ([Site Allocations Evidence Library](#)). Physical mitigation (which is all located within the highway boundary and has been designed, costed and taken into account in the update to the Viability Study [IV5] has been designed to ‘mop up’ any residual impacts once the sustainable mitigation impacts have been taken into account and the Transport Assessment [T9] concludes that the impact associated with the Plan would not be ‘severe’ in terms of the definition set out within the NPPF. The Mobility Strategies are a key element of the mitigation and provide the evidence of feasibility and deliverability of sustainable travel measures to assist in achieving the reduction of private car journeys. Evidence of cost has been developed and taken into account in the update to the Viability Study [IV5].
- 49.3. The Transport Study [T9] has robustly tested the impacts of the Plan on the network, informed and underpinned by a robust proportionate evidence base. The Merge Diverge Assessment of the A23 / M23 [T11] concludes that sufficient mitigation can be accommodated within the highway boundary. Proposed interventions have been prepared and costed and in principle agreed for 3 merge / diverges on the Strategic Road Network at the A23/B2118 Northbound merge, the A23/B2117 Southbound merge and the A23/A272 Southbound merge. It has been agreed that due to physical constraints, improvement measures at the A23/B2115 Southbound on slip merge and the A23/A272 Northbound off slip diverge are impracticable, however the assessment concludes that the impact associated with the Plan would not be ‘severe’ in terms of the definition set out within the NPPF.

- 49.4. This mitigation adequately addresses the Plan impacts in terms of capacity on the National Highways network. The mitigation has been designed, costed and apportioned across the sites based on impact and the Viability Study Note (2024) [IV5] demonstrates they can be delivered without affecting viability.
- 49.5. The Council has proposed Main Modifications, references M52, M53, M54 and M128 [DP2] in relation to a 'monitor and manage' approach. The Plan sets out commitment to deliver growth supported by the 'monitor and manage' approach which will review the actual demand on the network and the mitigation requirements and that the Council will convene a (nominally titled) Transport Infrastructure Management Group (which include West Sussex County Council (WSCC) and NH (as appropriate) to keep the effectiveness, deliverability and phasing of the transport infrastructure projects required to deliver the District Plan strategy under review, as part of a 'monitor and manage' process. This approach has been agreed by WSCC, as set out in the SoCG [DC15] between MSDC and WSCC.
- 49.6. The 'monitor and manage' approach will effectively monitor whether measures will be required and what from a package of mitigation is the most effective to delivery to ensure sustainable travel patterns are supported and car use is not inadvertently encouraged by over-providing capacity. There is no evidence to suggest that the planned growth cannot be delivered. All modelling is assessed based on 2039 reference case and any further assessment to determine the potential trigger points for necessary mitigation would need to be high level based on the Council's proposed phasing and timescale plans for development allocations. Work is ongoing with National Highways (NH) in respect of safety to refine a package of measures to ensure that the requirements of Paragraph 111 of the National Planning Policy Framework, September 2023 are met. A Statement of Common Ground (SoCG) is being prepared between the Council and NH prior to the Examination in Public which will agree a position on this work.

50. 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; DPI3: Major Infrastructure Projects and DP18: Viability justified, effective and consistent with national policy in relation to transport so as to avoid an 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 requirements?

Taken together, the policies of the Plan including the site allocations and policies DPT1, DPT2, DPT3 together with DPI1, DPI2, DPI3 and DPI8 are justified, effective and consistent with national policy in relation to transport to avoid an unacceptable impact on highway safety and ensure that the residual cumulative impacts on the road network would not be severe.

- 50.1. The Plan [DP1] strategy has an overarching principle of delivering growth at existing sustainable settlements where it continues to be sustainable to do so and then opportunities for extensions or new locations to improve sustainability (Sustainable Communities Significant Site allocations).
- 50.2. The Site Selection Methodology [SSP1], at paragraph 22, recognises that “sites of a significant scale can act as ‘stand alone’ settlements supported by on-site infrastructure and services which could enable them to be self sufficient and deliver sustainable places.” This is consistent with the NPPF, Paragraph 105, which states significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”. This approach also encompasses the principles in the West Sussex County Council (WSCC) Transport Plan (WSTP) 2022-2036 [T14], including prioritising sustainable travel and living locally, also referred to as 20-minute neighbourhoods.
- 50.3. The Mid Sussex Strategic Transport Study [T9] and associated Safety Study [T15] and proposed package of mitigation demonstrate that there will be no unacceptable impacts on highway safety. At this stage there are three severe impacts remaining on the WSCC network at B2110/B2028 Turners Hill, A272/B2036 Ansty and A273/B2116 Hassocks (Stonepound), however, it is understood that the extent of the exceedance of the agreed threshold for severe is not considered significant and there is a solution emerging. The solution and mitigation will focus on improving safety and active travel in these locations to reduce traffic passing through the severely impacted locations, rather than increasing junction capacity. This is due to a combination of physical and environmental constraints at these locations, as well as the position of the roads passing through these junctions in the County Council’s

network hierarchy i.e. not on the county's Strategic Road Network. Mitigation will be through a combination of a reduction of overall vehicular traffic alongside encouraging diversion of longer trips onto more strategic highway routes.

- 50.4. Mitigation will, therefore, be through a vision-based approach with a combination of delivery of sustainable travel schemes, delivering mixed use and sustainable communities or in combination with existing settlements, which minimise external travel demands leading to a reduction of overall vehicular traffic. In addition to this, work has been ongoing with the three significant site promoters on development of mobility strategies and sustainable travel measures which will be integral to the development of future masterplanning and delivery of these communities in order to minimise external travel demands. In addition, physical mitigation is focused on the strategic highway routes to encourage diversion of longer trips away from more minor routes.
- 50.5. This work and approach is recorded in the Memorandum of Understanding (MOU) [DC14] prepared and agreed between Mid Sussex District Council (MSDC) and WSCC. Further to the MOU, a Statement of Common Ground (SoCG) [DC15] has been prepared between MSDC and WSCC to provide a further update on matters.
- 50.6. The required mitigation has been designed, costed and apportioned to the sites, and is identified in the Infrastructure Delivery Plan (IDP) [IV4]. These costs have also been tested through the update to the Viability Study [IV5].

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

No main modifications are necessary for soundness.

- 51.1. The Council is proposing Main Modifications references M52, M53, M54, M55, M58 and M128 [DP2] to address the representation received from West Sussex County Council (WSCC) during the Regulation 19 consultation. These Main Modifications relate to a 'monitor and manage' approach and to requirements for provision of active travel infrastructure, which, in combination with the transport evidence, demonstrates that the requirements of national policy have been met.
- 51.2. The Infrastructure Delivery Plan (IDP) [IV4] identifies the required mitigation and associated costs. These costs have also been tested through the update to the Viability Study [IV5].
- 51.3. It has been agreed with West Sussex County Council, as set out in the Statement of Common Ground [DC15], that where necessary, a 'monitor and manage' approach will be used to monitor the actual demand on the network and the requirements of the schemes and that the Council will convene a (nominally titled) Transport Infrastructure Management Group (which include West Sussex County Council (WSCC) and NH (as appropriate) to keep the effectiveness, deliverability and

phasing of the transport infrastructure projects required to deliver the District Plan strategy under review, as part of a 'monitor and manage' process.