Memorandum from CPRE Sussex (Representee No: 1189028) re question 48 (Sustainable Transport effectiveness) raised by the Inspector for Stage 1 of the public examination of Mid Sussex DC's District Plan 2021 - 2039.

Matter 4: Transport: ***Issue 1: Whether the Plan is justified, effective and consistent with national policy in relation to transport***

Q.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%?*

1. CPRE Sussex is concerned to ensure that a realistic view is taken of the very limited likely effectiveness of any proposed sustainable transport measures when assessing the sustainability of significant new site allocations, especially those that would be rurally located with their central hub being more than a mile from the more than the key infrastructure (supermarket, main line railway station, health, sports and culture facilities etc) on which their residents will depend.

2. As we made clear in our Regulation 19 representations, CPRE Sussex is particularly concerned at the implications for the proposed Sayers Common allocation sites DPSC3 – DPSC7. The Council's claim that these allocations constitute urban extensions of Burgess Hill and, as a result can be turned into 20 minute self-sustaining neighbourhood communities is unjustified[1]. They are all rural sites on the opposite side of the A23 from Burgess Hill up to 7 km away from the centre of Burgess Hill. They will all depend on access to Burgess Hill or other urban locations for most of the facilities on which their residents will depend. Most residents' work opportunities will also be remote from their homes.

3. No part of the sites is in walking distance of Burgess Hill. The Town & Country Planning Association's "20 Minute Neighbourhoods" study[2] (March 2021) reports that "*Studies have shown that most people will choose to walk only if their destination is less than a mile away, with 800 metres being a typical catchment area. Data from the 2019 National Travel Survey shows that around 80% of trips of under a mile were undertaken on foot.*" (p18) Nothing in the TCPA study supports the premise that successful 20 Minute Neighbourhoods can be created otherwise than in a densely populated urban environment.

4. The Mid Sussex Local Cycling & Walking Infrastructure Plan (MSDC Doc T12) does not include any plan to ensure the connectivity of the Sayers Common allocation sites with Burgess Hill. That plan concludes that cycling over 5km is unlikely to be an attractive option – which may well explain why there appears to be no plan to deliver walking or cycling connectivity to and from Burgess Hill. No evidence is even available to demonstrate that safe, lit and accessible cycle routes would be available to connect the new community with the facilities they would require in Burgess Hill. Nor even as to the journey lengths, which is particularly relevant given the Plan's finding that the sustainability effectiveness of cycle routes exceeding 5 km would be very limited. Neither funding for their construction, nor likely user take up, can be measured in the absence of this evidence.

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[1] If it were true that these sites represent an urban extension of Burgess Hill their allocation would involve the coalescence of Burgess Hill with Sayers Common and Albourne, contrary to proposed Plan policy DPC2 and current Plan policy DP13.

[2] https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

5. Most people will only use public buses as an alternative to cars if the service runs at least every 20 minutes (including in the evening and at weekends). There has to be sufficient demand to make this commercially viable in the medium and long term. The population of the proposed significant sites will not be sufficient to assure that viability.

6. There is no evidence that car sharing schemes have more than a minimal impact.

7. Wherever new development is located close to a regular road network sustainable alternative travel options (which are particularly key to the effective delivery of 20 minute neighbourhoods) are going to succumb to the lure of the car, and the convenience and flexibility that it offers. Common sense, allied to all the available evidence indicates that the positive impact of sustainable transport options, however laudable in principle, is minimal; and does not make an otherwise unsustainable development location sustainable.

8. That is true of Sayers Common, where it is admitted in MSDC's Travel Study that cycle routes within the identified sites would only lead to a reduction in highway traffic of 1-2%. It is equally true of other larger housing site proposals as well as the rightly unallocated Cucksty site at Ansty where even the promoter's own optimistic travel plan anticipates a mere 5% reduction in single occupancy car travel after 5 years.

9. We note the conclusion of National Highways that the Council's sustainable transport strategy is unsound: In relation to policy DPT1 their regulation 19 representation para 28 says: "*Existing Transport Assessment, Transport Statement and Travel Plan are robust but unlikely to be sufficient in the context of achieving net zero, reduced emissions, and 20-minute neighbourhoods nor for the cumulative impacts of developments with hundreds of new homes.*"

10. The promotion of sustainable transport measures is of course to be encouraged, and is an expectation of the NPPF. However, sustainable transport mitigation measures supporting allocations are likely to be ineffective to deliver material modal shift away from cars. Sustainable transport proposals will therefore rarely, if ever, by themselves render an otherwise unsustainable rural site allocation sustainable in the absence of exceptional circumstances.

11. This conclusion is supported by the evidence from a 2020 Transport for New Homes/ CPRE joint report called "Garden Villages and Garden Towns: Visions v Reality"[3]. This report studied the actual impact of 20 new permitted village developments and concluded that all of them have ended up as car dependent communities: not a single one of them had ended up delivering the sustainability that the developers promised, particularly when it came to transport sustainability.

12. It is also consistent with the Department of Transport's latest National Travel Survey (August 2023)[4] whose findings include the conclusion that the private car remains by far the most popular means of transport, and that active travel options (especially in rural areas) have a very limited impact on mode of travel choices.

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[3] https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf

[4] https://www.gov.uk/government/statistics/national-travel-survey-2023