



Western Bridge and Link Road (WBLR) Phase 3 (Brookleigh, Burgess Hill)

Sustainability Statement

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Revision		Status	
Pnn	Preliminary (shared; non-contractual)	S1	Coordination
Cnn	Contractual	S2	Information
		S3	Review & Comment
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		S5	Review & Acceptance
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1. Introduction

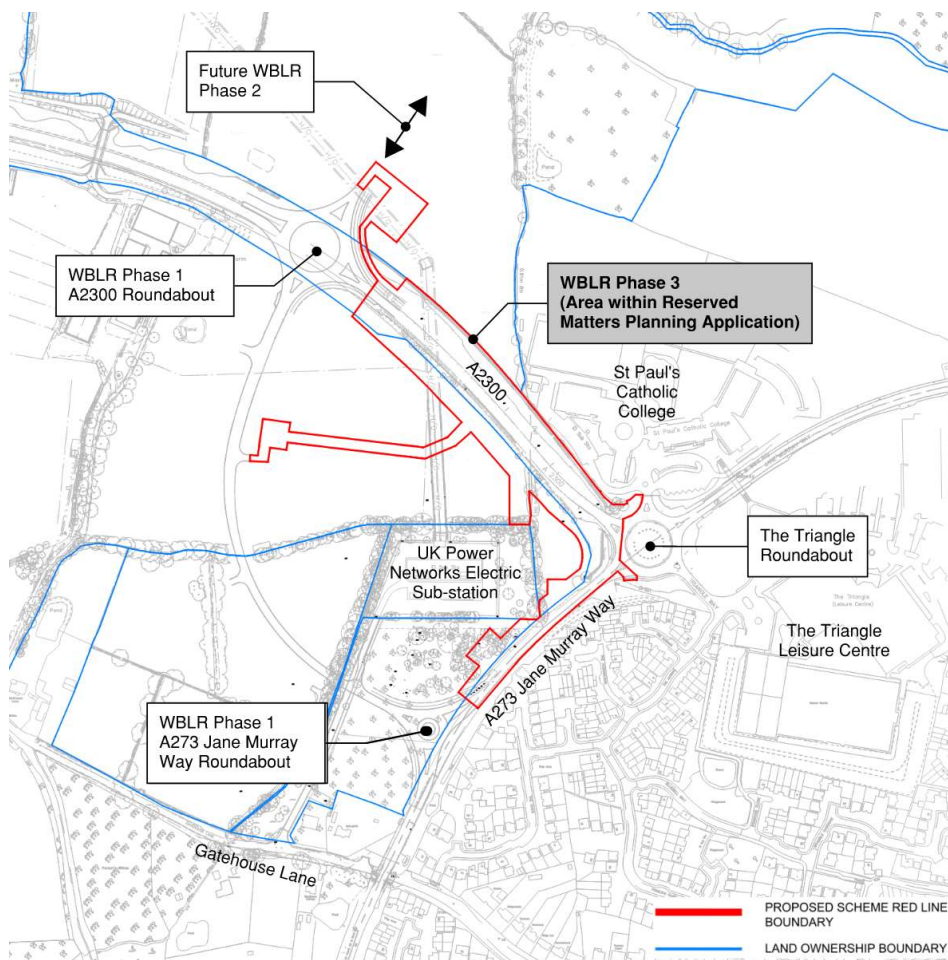
1.1 Background and Overview

Waterman Infrastructure & Environment (herein referred to as 'Waterman') has been commissioned by Jackson Civil Engineering on behalf of Homes England (the 'Applicant') to prepare a Sustainability Statement in support of two planning applications for new pedestrian and cycle routes.

The development intends to provide highways infrastructure improvements known as Phase 3 of the Western Bridge and Link Road (WBLR). The development is subject to a Full application and a separate but concurrent Reserved Matters application (RMA), which is pursuant to development authorised by an outline planning permission for a mixed-use urban extension on land to the north-west of Burgess Hill (Application Reference: DM/21/3279) (hereafter referred to as the 'Brookleigh Development').

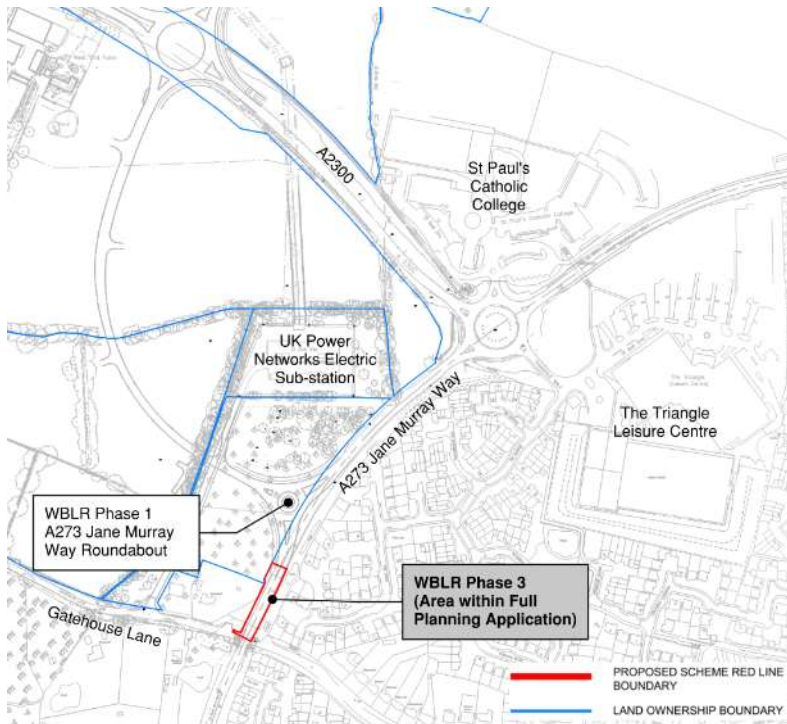
Together, the works proposed on land within the Brookleigh Development area (Reserved Matters Application) and the land located outside of it (Full Application), are referred as 'the Proposed Scheme'. The Proposed Scheme is located within the administrative boundary of Mid Sussex District Council (MSDC). The planning boundaries for the RMA Application Site and the Full Application Site are shown in **Figure 1** and **Figure 2** respectively.

Figure 1: RMA Planning Application Boundary



Source: Annotated extract from 19442-WIE-ZZ-XX-DR-C-900004-P02 (Location Plan – RMA)

Figure 2: Full Planning Application Boundary



Source: Annotated extract from 19442-WIE-ZZ-XX-DR-C-900005-P01 (Location Plan - Full)

1.2 Planning History

In December 2018, an outline planning application (OPA) for the Brookleigh Development, was submitted to MSDC, with the following description of development (Ref. DM/18/5114):

“Comprehensive, phased, mixed-use development comprising approximately 3,040 dwellings including 60 units of extra care accommodation (Use Class C3) and thirteen permanent gypsy and traveller pitches, including a Centre for Community Sport with ancillary facilities (Use Class D2), three local centres (comprising Use Classes A1-A5 and B1, and stand-alone community facilities within Use Class D1), healthcare facilities (Use Class D1), and employment development comprising a 4 ha dedicated business park (Use Classes B1 and B2), two primary school campuses and a secondary school campus (Use Class D1), public open space, recreation areas, play areas, associated infrastructure including pedestrian and cycle routes, means of access, roads, car parking, bridges, landscaping, surface water attenuation, recycling centre and waste collection infrastructure with associated demolition of existing buildings and structures, earthworks, temporary and permanent utility infrastructure and associated works.”

Outline planning permission was granted in October 2019.

A subsequent Section 73 application was approved in December 2022 (Ref. DM/21/3279) for the following:

“Planning Application under Section 73 of the Town and Country Planning Act 1990 (as amended) seeking alterations to conditions 5 (approved parameter plans), 6 (accordance with Design Guide) , 7 (requirement for a Design Principles Statement), 11 (archaeological investigation), 22 (sustainable drainage) and 35 (restriction of development within 15m of ancient woodland), removal of conditions 50 (public transport strategy) and 51 (phase public transport strategy), addition of new conditions relating to public art on planning permission DM/18/5114, to allow amendments to site boundary, densities and heights, parameters of road layout, proposed land uses, right of way improvements & drainage outfalls, require general accordance with the Street Design and Adoption Manual, allow phased submission of details for archaeology and drainage details and require a public transport strategy and financial

contributions towards the public transport strategy to be secured in the legal agreement. Amendments to the legal agreement associated with the amendments to the conditions and additional amendments related to the delivery of open space parcels OS1.2N, OS1.2S, OS3.3 and OS3.4, the Centre for Outdoor Sports, Employment Strategy, the Secondary School, Mobility Corridors, payment of financial contributions and monitoring fees (Amendments received, including an addendum to the Environmental Statement)”

1.3 Purpose of this Document

This Sustainability Statement sets out how the layout and design of the Proposed Scheme has taken account of the principles of sustainable development and how the detailed design of new infrastructure will seek to minimise the use of finite materials and energy.

Planning condition 16, for the Brookleigh Development, requires a Sustainability Statement to be prepared for each RMA. Planning condition 16 states:

“No development shall proceed within each reserved matters area unless and until a Sustainability Statement for that reserved matters area has been submitted to and approved in writing by the local planning authority. The development of that reserved matters area shall proceed in accordance with such approved details unless otherwise agreed in writing with the local planning authority.”

In addition, MSDC requires the full planning application to be accompanied by a Sustainability Statement. The requirement for this is as follows:

A Sustainability Statement is required for all applications with the exceptions of:

- *Householder planning applications,*
- *Non-residential change of use applications*
- *Listed building consent applications.*

A Sustainability Statement should contain all details necessary to demonstrate how the proposed development will be efficient in its use of energy, water and drainage to comply with Policy DP39 of the Mid Sussex District Plan and any relevant Neighbourhood Plan policy.

Following discussion with MSDC, it was agreed that a single Sustainability Statement, covering the Proposed Scheme as set out in the RMA and Full applications, will be submitted with these separate applications.

2. Site Description and Context

The Proposed Scheme is located in a semi-rural setting on the north-western outskirts of Burgess Hill in West Sussex and is located within the district of Mid Sussex. The Proposed Scheme is approximately centred on National Grid Reference 529631, 120070, with an approximate postcode of RH15 8UZ.

2.1 RMA Application Site Description

The RMA Application Site is broadly linear and covers an area of approximately 2.8 hectares, which comprises a 320m-long section of land adjacent the A2300, between the roundabout and the Triangle Roundabout and a 170m-long section of land located along the western side of the A273, between the Triangle Roundabout and the A273 roundabout.

The RMA Application Site can be described in terms of three principal sections:

- Land immediately adjacent (north) of the A2300 comprises a sparsely vegetated roadside verge (following recent works undertaken by UK Power Networks, UKPN), together with broadleaved woodland and mixed scrub. A section of footpath (14Hu) runs along the northern verge. On the north side of the woodland and scrub is a drainage ditch;
- Land immediately adjacent (south) of the A2300 comprises roadside verge (mostly mixed scrub with some modified grassland and mature trees). Beyond the roadside verge, at the bottom of the embankment, the Application Site includes a field of modified grassland, featuring some bramble scrub and a short section of hedgerow. At the southern end of the hedgerow is a ditch, which follows the boundary of the UKPN electricity substation compound. A section of footpath (98CR) crosses the A273 and A2300 at the Triangle Roundabout; and
- Land immediately adjacent (west) of the A273 Jane Murray Way, between the Triangle Roundabout and the A273 roundabout is comprised of roadside verge (mostly modified grassland with some scrub), adjacent to the UKPN electricity substation, which is surrounded by broadleaved woodland.

The topography of the RMA Application Site broadly falls from the north-west to the south-east, with the land adjacent to the A2300 being approximately 30 metres Above Ordnance Datum (AOD) and the land adjacent to the A273 Jane Murray Way being approximately 25 metres AOD.

There are no statutory or non-statutory designated areas (e.g. Sites of Special Scientific Interest or Listed Buildings) within the RMA Application Site. With the exception of a number of smaller water features (including land drains and ponds), there are no watercourses within the RMA Application Site.

2.2 Full Application Site Description

The Full Application Site is linear and covers an area of approximately 0.1 hectare, which comprises a 68m-long section of land on the western side of the A273, between the A273 roundabout and Gatehouse Lane. Land immediately adjacent (west) of the A273 Jane Murray Way, between the A273 roundabout and Gatehouse Lane comprises a narrow roadside verge of modified grassland and includes a bus stop.

Within the Full Application Site, topography is relatively flat and is approximately 25 metres AOD.

There are no statutory or non-statutory designated areas (e.g. Sites of Special Scientific Interest or Listed Buildings) or watercourses within the Full Application Site.

2.3 Land Adjacent to the Proposed Scheme

As a predominantly linear form of development that follows the alignment of the existing highway, the land adjacent to the Proposed Scheme is generally comprised of vegetated roadside verge and agricultural fields.

The principal exceptions are the electricity substation (UKPN), which is located adjacent to the east of the Triangle Roundabout (A2300 / A273 Jane Murray Way), relevant to the RMA Application Site, and Springfield House, adjacent to A273 and Gatehouse Lane, relevant to the Full Application Site. Neither the substation nor Springfield House are included within the Brookleigh Development.

2.4 Surrounding Development Context

The Proposed Scheme is located adjacent to the north-western edge of Burgess Hill, with the A273 Jane Murray Way predominantly representing the boundary between the urban area of the town and the surrounding countryside.

Land to the north and north-west of the RMA Application Site, beyond the A2300, has a predominantly rural character, comprising agricultural fields divided by a network of hedgerows, woodland blocks / belts and watercourses. The Goddards Green Wastewater Treatment Works is approximately 475 metres to the northwest of the RMA Application Site and there is a solar farm approximately 770 metres to the northwest.

Land to the east of the RMA Application Site, beyond the A273, is predominantly residential in character, with supporting infrastructure including schools, places of worship, community facilities and retail uses. The Triangle Leisure Centre represents a significant land use approximately 120m to the east of the Application Site. Immediately adjacent to the north-east of the RMA Application Site, on the northern side of the A2300 is the St Pauls Catholic College.

Land to the south and south-west is also predominantly rural in character, although there is a healthcare facility (The Dene) approximately 510m to the west and 525m north-west of the RMA and Full Application Sites respectively, and some commercial land uses at Goddards Green, approximately 400m to the west and 575m to the north-west of the RMA and Full Application Site respectively.

Topography on land surrounding is broadly comparable with the Proposed Scheme. North of the A2300, the land slopes gently towards the northeast, reducing from approximately 30 metres AOD at the road to approximately 20 metres AOD at the River Adur. To the north of the river, ground levels increase from approximately 19 to 25 metres AOD. The highest ground in the vicinity of the Proposed Scheme lies to the north of The Dene, at up to 36 metres AOD.

3. Description of the Proposed Scheme

3.1 The Reserved Matters Application

The Proposed Scheme comprises land which is subject to Reserved Matters pursuant to the wider Brookleigh Development. The description of development for the Reserved Matters application is:

“Reserved Matters application pursuant to outline application DM/21/3279 - WBLR Phase 3 (A2300 pedestrian/cycle improvement), comprising the construction of a segregated 2 metre footway and 3 metre cycle track (Green Superhighway) and 2.75 metre verge along the northern side of the A2300, construction of a 3-metre shared use route with up to up to 1 metre verge along the southern side of the A2300, construction of a 3 metre shared use route along the western side of the A273 Jane Murray Way with up to 2.75 metre verge drainage works, fencing, lighting, landscaping and associated works.”

The elements of the Proposed Scheme, within the RMA Application Site include:

- A new segregated footway and cycle track on the north side of the A2300, between the new Link Road roundabout and the Triangle Roundabout. This forms part of the ‘Green Superhighway’, proposed as part of the Brookleigh Development;
- A new shared connection non-motorised users (NMU) on the south and west side of the A2300 and A273, respectively. This shared route connects the two roundabouts on the A2300 and A273 (WBLR Phase 1 works), via the Triangle Roundabout;
- An NMU connection to the future development area;
- Installation of new surface water drainage infrastructure (filter drains, ditch and swale), and adjustments to existing (culverts and headwalls);
- Installation of new street lighting; and
- Landscaping to the north of the A2300.

3.2 The Full Application

The Proposed Scheme also comprises land outside of the Brookleigh Development area, which is subject to a separate, full planning application. The description of development for the full planning application is:

“Widening and extension of the existing footway for creation of a shared footway/cycleway along the western side of the A273 between Gatehouse Lane and A272 roundabout via the removal of the carriageway hard strip, relocation of existing bus stop bench, lighting, landscaping and associated works.”

The elements of the Proposed Scheme, within the Full Application Site include:

- A new shared connection non-motorised users (NMU) on the west side of the A273, which connects the roundabout on the A273 (WBLR Phase 1 works) with Gatehouse Lane; and
- Installation of new street lighting; and
- Relocation and re-provision of the bus stop.

4. Planning Policy Review

4.1 National Policies

4.1.1 The National Planning Policy Framework

The National Planning Policy Framework¹ (NPPF) (2024) and associated National Planning Practice Guidance (PPG) form the basis for Local Plan preparation and Local Planning Authority decision-making. The NPPF adopts the Brundtland Commission² definition of sustainable development; *'meeting the needs of the present without compromising the ability of future generations to meet their own needs.'*

Central to the NPPF, within paragraph 11, is the presumption in favour of sustainable development and that development proposals which accord with an up-to-date development plan should be approved without delay.

Paragraph 161 of the NPPF addresses the challenge of climate change, confirming that the planning system should 'support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimize vulnerability and improve resilience; and encourage the reuse of existing resources, including conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.'

Paragraph 164 requires that new development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Paragraph 166 requires that in determining planning applications, local planning authorities should expect new development to:

- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

The NPPF outlines further related policies included in the following:

- Chapter 8: The need to promote healthy and safe communities, for example with connected and legible pedestrian and cycling routes, and an accessible green infrastructure network.

¹ Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2012): National Planning Policy Framework (Last Updated: 12 December 2024). Available online: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/126171/nppf-2024.pdf) (Accessed: 02/01/2025)

² Brundtland, G. (1987). Report of the World Commission on Environment and Development: Our Common Future. United Nations General Assembly document A/42/427

- Chapter 9: The obligation to promote sustainable transport, for example by mitigating any adverse impacts of increased traffic.
- Chapter 14: The need to meet the challenge of climate change, flooding and coastal change, including by increasing use and supply of low carbon energy and heat as well as planning based on flood risk.
- Chapter 15: The need to conserve and enhance the natural environment, for example through recognising the intrinsic character and beauty of the countryside as well as the benefits from natural capital and ecosystem services.

4.2 Local Policies

4.2.1 Mid Sussex District Plan

The Mid Sussex District Plan 2014-2031³ (the District Plan) was adopted as a Development Plan Document by MSDC on 28th March 2018. The District Plan supports development of the Brookleigh Development (formerly the Northern Arc Strategic Allocation) to make a significant contribution to meeting local housing need and to help accelerate the regeneration of Burgess Hill. It is noted that a draft District Plan 2021-2039 was submitted for Examination in July 2024; it is anticipated that the revised district plan will be adopted in 2025; but in the meantime, the District Plan adopted in 2018 is still valid.

The following policies, within the current District Plan, are of particular relevance to this Sustainability Statement.

Policy DP7 'General Principles for Strategic Development at Burgess Hill' states that all strategic development at Burgess Hill must support the following general principles:

- Be designed in a way that integrates it into the existing town providing connectivity with all relevant services and facilities;
- Improve public transport, walking and cycling infrastructure and access to Burgess Hill and Wivelsfield railway stations and Burgess Hill Town Centre, including the provision of, or contributions to enhancing transport interchanges;
- Provide necessary transport improvements that take account of the wider impact of the development on the surrounding area;
- Provide new and improved community, retail, cultural, educational, health, recreation, play and other facilities to create services and places that help to form strong local communities and encourage healthy lifestyles;
- Provide new and/or improved and well connected sports, recreation and open space in and around Burgess Hill, including the continuation of the existing 'Green Circle' of linked areas of informal open space and multi-functional paths, and links into the town centre;
- Support delivery of a multi-functional route between Burgess Hill and Haywards Heath;
- Identify and respond to environmental, landscape and ecological constraints and deliver opportunities to enhance local biodiversity and contribute to the delivery of green infrastructure in and around the town; and
- Wherever possible, incorporate on-site 'community energy systems' to meet energy needs and create a sustainable development, and include appropriate carbon reduction, energy efficiency and water consumption reduction measures to demonstrate high levels of sustainability.

³ Mid Sussex District Council (2018) Mid Sussex District Plan 2014 - 2031. Available online: <https://www.midsussex.gov.uk/media/3406/mid-sussex-district-plan.pdf> (Accessed 21/10/2024)

Policy DP21: Transport requires development to support the objectives of the West Sussex Transport Plan 2011-2026. These objectives are set out broadly as; a high quality transport network that promotes a competitive and prosperous economy; a resilient transport network that complements the built and natural environment reducing carbon emissions; access to services, employment and housing; and a safer and healthier to use transport networks.

Policy DP22: Rights of Way & Other Recreational Routes seeks the protection of rights of way, Sustrans national cycle routes as well as other recreational routes. This policy also seeks to ensure development does not result in the loss and severance of valuable rights of way unless new routes of equivalent value and quality are provided.

Policy DP29: Noise, Air and Light Pollution seeks to ensure protection from unacceptable levels of noise, light and air pollution and to minimise the impact on landscapes, areas of nature conservation, wildlife habitats and the quality of people's lives.

Policy DP37: Trees, Woodland and Hedgerows development that involves the protection and enhancement of trees, woodland and hedgerows and encourages new planting will be supported.

Policy DP38: Biodiversity underlines that biodiversity will be protected and enhanced by ensuring development; contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green infrastructure so that there is a net gain in biodiversity; protects existing biodiversity; minimises habitat and species fragmentations and maximises opportunities to enhance and restore ecological corridors; and protects locally designated Sites of Nature Conservation Importance, Local Nature Reserves and Ancient Woodland.

Policy DP39: Sustainable Design and Construction requires that development proposals maximise efficient use of resources, including minimising waste and maximising recycling / reuse of materials through construction. It also requires that development demonstrates how the risks associated with future climate change have been planned for as part of the layout and design.

DP41: Flood Risk & Drainage requires proposals for development to follow a sequential risk-based approach, and to ensure development does not increase the risk of flood elsewhere and is safe across its lifetime. Sustainable Drainage Systems (SuDS) should be implemented in all new major development unless demonstrated to be inappropriate.

DP42: Water Infrastructure & Water Environment requires new development to be in accordance with the objectives of the Water Framework Directive, and accord with the findings of the Gatwick Sub Region Water Cycle Study with respect to water quality, water supply and wastewater treatment.

4.2.2 Mid Sussex Development Infrastructure and Contributions Supplemental Planning Document

Mid Sussex Development Infrastructure and Contributions Supplemental Planning Document⁴ (SPD) replaced the 2006 SPD to reflect the adoption of the District Plan in 2018. This SPD sets out the overall framework for the management of planning obligations. Relevant guidance includes:

- Sustainable transport (good provision for cyclists, pedestrian and public transport access);
- Flood mitigation and water infrastructure (provision of sustainable drainage systems, water infrastructure to provide adequate capacity, water efficiency standards under Part G of Building Regulations);

⁴ Mid Sussex District Council (2018) Mid Sussex Development Infrastructure and Contributions - Supplemental Planning Document. Available online: <https://www.midsussex.gov.uk/media/3614/development-infrastructure-and-contributions-spd.pdf> (Accessed: 21/10/2024)

- Waste management (provision of on-site site-specific waste and recycling provision); and
- Green infrastructure and biodiversity (minimising habitat fragmentation, enhancing green infrastructure and its connectivity).

5. Compliance Against the NPPF and Local Policy Objectives

5.1 Introduction

This section of the Sustainability Statement focuses on those aspects that can be influenced by the Proposed Scheme, namely:

- Water cycle management;
- More sustainable transport;
- Resource efficiency; and
- Green infrastructure and biodiversity.

5.2 Water Cycle Management

5.2.1 Key Policy Guidance

The following NPPF and District Plan policies are considered relevant to the consideration of water cycle management:

- NPPF Chapter 14: Meeting the challenge of climate change, flooding and coastal change (paragraphs 161 – 182)
- Mid Sussex District Plan: Policy DP41: Flood Risk and Drainage
- Mid Sussex District Plan: Policy DP42: Water Infrastructure & Water Environment
- Mid Sussex Development Infrastructure and Contributions - Supplementary Planning Document: Flood mitigation and water infrastructure

5.2.2 Compliance with policies

The Proposed Scheme is wholly within Flood Zone 1, hence the land is at the lowest risk of flooding.

The Environment Agency (EA) surface water flood maps show that the majority of the Proposed Scheme Site has a 'low' risk of surface water flooding. However the land running parallel to the A2300 and encompassing the drainage ditch and culvert, a section of which falls within the RMA Application Site, has 'high' risk of surface water flooding. The Drainage Strategy and Maintenance Report identifies that this has resulted from poor maintenance, as the size of the existing culvert in place beneath the A2300 has been assessed and has ample capacity of the size of the catchment and rate of flow it serves.

A Flood Risk Assessment (FRA) was prepared for the Brookleigh Development, which has been used to inform the Drainage Strategy for the Proposed Scheme.

The Drainage Strategy and Maintenance Report, which has been submitted in support of the Reserved Matters Application and Full Application, details the proposed surface water drainage strategy and has been designed in accordance with the NPPF and the accompanying Guidance and Technical Standards for sustainable drainage systems (SuDS).

At present, the RMA Application Site drains to either the existing carriageway drainage system, to existing drainage ditches adjacent to the A2300 and A273, or off into the adjacent woodland. The Full Application Site drains into the existing carriageway, adjacent to the A273. The surface water drainage strategy for the Proposed Scheme mirrors the existing drainage arrangements as closely as possible. However, additional integrated sustainable drainage systems (SuDS) will be introduced along parts of the new paved areas. Within the RMA boundary, a swale and new drainage ditch will be provided on the south side of the A2300, and filter drains will be provided along the A273 to convey surface water into attenuation ponds in WBLR Phase 1 which then attenuate flows via a controlled outfall equivalent to greenfield rates into the existing watercourse (a tributary of the Pook Bourne).

Along the north side of the A2300 (within the RMA Application), the new paved strip forming the footway and cycletrack will be allowed to run off along its length into the adjacent grass and vegetation area which has a gentle slope towards the adjacent parallel ditch. This land will act as a filter strip (SuDS Manual Chapter 15) which will promote sedimentation, filtration and infiltration.

Policy DP41 requires that SuDS should be implemented to avoid any increase in flood risk and to protect surface and ground water quality and arrangements for the long-term maintenance and management of SuDS should also be identified. Furthermore, Policy DP42 requires there to be sufficient capacity for surface water provision. MSDC has been consulted regarding the drainage strategy for the north and south side of the A2300 (RMA Application Site), in which it was discussed that runoff rates in this area would not meet greenfield rates, and it is understood that the proposed strategy is considered acceptable due to the small area of the catchments involved and the impracticality of attenuating / controlling such small target discharge flows. It is understood that MSDC is satisfied that the uncontrolled flows from these areas is / can be suitably compensated for in other areas of the Brookleigh Development where attenuation is more easily achieved.

Within the Full Application Site, runoff from the shared route along the west of the A273 (between the A273 roundabout and Gatehouse Lane) will discharge to the drainage system within the carriageway. To ensure that the SuDS features, included within the RMA Application Site, work efficiently a Schedule of Maintenance is provided within the Drainage Strategy.

No foul water will be generated by the Proposed Scheme.

The strategy has been discussed and agreed in principle with MSDC during the pre-application consultation process. As a statutory consultee, West Sussex County Council requires a site-specific drainage strategy that demonstrates that the drainage scheme proposed is in compliance with West Sussex County Council's sustainable drainage policies.

Based on the above, it is considered that the Proposed Scheme accords, as far as practicably, with the relevant policies detailed within Chapter 14 of the NPPF, the District Plan policies and Development Infrastructure and Contributions SPD relating to water cycle management. The approach as set out above has been agreed in principle with MSDC, who is understood to have consulted with West Sussex County Council (Lead Local Flood Authority) during the pre-application consultation process.

5.3 More Sustainable Transport

5.3.1 Key Policy Guidance

The following NPPF and District Plan policies are considered relevant to the consideration of sustainable transport:

- NPPF Chapter 8: Promoting healthy and safe communities (paragraphs 96 – 108)
- NPPF Chapter 9: Promoting sustainable transport (paragraphs 109-118)
- Mid Sussex District Plan: Policy DP7 General Principles for Strategic Development in Burgess Hill
- Mid Sussex District Plan: Policy DP21: Transport
- Mid Sussex District Plan: Policy DP22: Rights of Way & other Recreational Routes.
- Mid Sussex Development Infrastructure and Contributions - Supplementary Planning Document: Sustainable transport

5.3.2 Compliance with policy

The Brookleigh Development has been designed to facilitate a main public transport corridor and has integrated a number of proposals to encourage more sustainable travel options. These include the provision of a number of strategic green connections, pedestrian and cycle links, centres and walkable neighbourhoods, electric vehicles and public transport.

The Proposed Scheme should not be considered in isolation as it provides the necessary infrastructure and connections for a number of these options to be facilitated once the further phases of the Brookleigh Development are completed. The new segregated footway and cycle routes, on the north side of the A2300 (within the RMA Application Site), will serve a strategic function as they will form part of the new Super Green Highway which will benefit the new occupants of the Brookleigh Development and the existing local community.

The new pedestrian and cycle infrastructure within the Proposed Scheme will provide the opportunities to facilitate use of non-car modes of transport by providing safe and convenient routes for walking and cycling. These routes provide continuity in pedestrian and cycle access between the Brookleigh Development and Burgess Hill and will facilitate more sustainable travel patterns and more active lifestyles by improving opportunities for good connectivity. It is considered that this approach is in accordance with policies within Chapters 8 (paragraph 96) and 9 (Paragraph 117) of the NPPF.

The provision of the proposed pedestrian and cycle infrastructure also accords with the District Plan Policies DP7 and DP21 as it will provide “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 and cycling”.

The opportunities for improved connections via the pedestrian and cycle infrastructure within the Proposed Scheme and intersection with existing rights of way (and the future Brookleigh Development Green Super Highways) are consistent with the objectives of Policy DP22 to provide links to rights of way / other recreational routes and contribute towards a joined-up network of routes.

Based on the above, it is considered that the Proposed Scheme accords with the relevant policies detailed within the NPPF, the District Plan policies and Development Infrastructure and Contributions SPD relating to sustainable transport.

5.4 Resource Efficiency

5.4.1 Key Policy Guidance

The following District Plan policies and other material considerations are considered relevant to the consideration of resource efficiency:

- Mid Sussex District Plan: Policy DP39: Sustainable Design and Construction
- Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document (SPD) (July 2018): Waste management

5.4.2 Compliance with policy

The Proposed Scheme will seek to be resource efficient and will include the efficient use of land and building materials in addition to making good use of waste materials through the implementation of the waste hierarchy (i.e. prevention, preparing for re-use, recycling, other recovery and disposal as set out in the Waste (England and Wales) Regulations 2011 (as amended)).

A single Outline Construction Environmental Management Plan (CEMP) covering the Proposed Scheme is submitted with the Reserved Matters and Full applications which outlines the control measures and mitigation arrangements with regards to construction waste during all phases on construction; this accords with Policy DP39 of the District Plan which encourages the efficient use of resources, including minimising waste and maximising recycling and the re-use of materials. The Outline CEMP includes details for the storage and collection of waste and recyclable materials which complies with paragraphs 3.108 under Waste Management of the Development Infrastructure and Contributions SPD.

Waste will be generated during the construction phase only. Potential waste arising from site clearance, primary infrastructure and earthworks is expected to comprise vegetation, topsoil, rubble, tarmac (from the A2300 and A273), gravel and clay material. Material excavated during ground works will, where suitable for re-use within the Proposed Scheme, be graded and re-used within construction, where appropriate and where required. All suitable clean excavated material will be reused however any contaminated material that would require removal from the Application Site would be collected by suitable waste carriers and sent for disposal at appropriately licensed waste facilities. In accordance with Planning Condition 17 for the Brookleigh Development, a Waste and Recycling Management Strategy would be prepared by the appointed contractor and submitted to MSDC for agreement (pre-commencement).

The Proposed Scheme has, where possible, been designed to work with the topography of the Application Site in order to reduce the amount of earthworks and levelling. Much of the new paved areas are adjacent to and are therefore constrained to broadly follow the levels of the existing carriageway. This necessitates the widening of the existing carriageway embankments which will re-use surplus material from adjacent WBLR phases if available and suitable for use. To the south side of the A2300 the new shared use footway deviates away from the carriageway allowing it to more closely follow the existing ground profile. This section is designed to be slightly above existing ground levels to minimise the need to excavate and dispose of material and avoid disturbing the roots of the adjacent trees.

In addition to construction waste, other resources which will be consumed during the construction phase include fuel consumption of construction vehicles and the use of electricity. Whilst there is power supply within the Application Site, this is limited to street lighting. During the construction phase, the use of diesel or petrol-power for electricity generation will be avoided, where practicable mains or battery power would be used. The new and replacement street lighting will connect from the existing network supply.

Based on the above, it is considered that the Proposed Scheme accords with the principles detailed within the District Plan policies and Development Infrastructure and Contributions SPD relating to resource efficiency.

5.5 Green Infrastructure and Biodiversity

5.5.1 Key Policy Guidance

The following NPPF and District Plan policies are considered relevant to the consideration of green infrastructure and biodiversity:

- NPPF Chapter 8: Promoting healthy and safe communities (paragraphs 96 - 108)
- NPPF Chapter 15: Conserving and enhancing the natural environment (paragraphs 187 – 201)
- Mid Sussex District Plan: Policy DP29: Noise, Air and Light Pollution
- Mid Sussex District Plan: Policy DP37: Trees, Woodland and Hedgerows
- Mid Sussex District Plan: Policy DP38: Biodiversity
- Mid Sussex Development Infrastructure and Contributions - Supplementary Planning Document: Green infrastructure and biodiversity

5.5.2 Compliance with policy

The Proposed Scheme has been informed by a series of ecological baseline assessments, most recently being undertaken during 2024. These surveys confirmed that the predominant habitats within the Application Site include sections of hedgerows, Broadleaved woodland, improved grassland and running water. With respect to protected species, within the RMA Application Site surveys confirmed the presence of trees with 'low' bat roost potential, sections of hedgerow and suitable terrestrial habitat for reptiles and great crested newts.

Policy DP29 seeks to ensure protection from unacceptable levels of noise, light and air pollution and to minimise the impact on landscapes, areas of nature conservation, wildlife habitats and the quality of people's lives. The Proposed Scheme has been designed to provide a clean and quiet mode of travel, which provides added health benefits. In addition, careful consideration has been given to the lighting strategy to avoid, where possible, light spill into habitat areas and neighbouring properties.

Policy DP37 seeks to ensure that development does not damage or lead to loss of trees and where possible incorporating existing important trees, woodland and hedgerows into the design of the development. The linear nature of the Proposed Scheme and its functional requirement as a shared route to connect the A2300 roundabout (WBLR Phase 1A) to Gatehouse Lane, via A273 roundabout (WBLR Phase 1B) is such that loss of a proportion of the trees cannot be avoided. Loss of trees was assessed through the Brookleigh Development and this has been supplemented by a further tree survey in October 2022. The updated tree survey confirmed that three groups of Category B trees and 12 Category C trees will require removal to facilitate the Proposed Scheme. The Arboricultural Impact Assessment⁵ (AIA) submitted as part of the Brookleigh Development confirmed that mitigation will be provided for loss of trees through a high quality scheme of new tree planting and associated landscaping; this has been supplemented by an updated AIA to accompany this planning application. Tree planting has been incorporated within the RMA Application Site on land between the Triangle Roundabout and the UKPN electricity substation.

With respect to Policy DP38, no international, national or locally designated sites will be affected by the Proposed Scheme. There are no Sites of Special Scientific Interest (SSSI) within 2km of the Application Site for either the Reserved Matters Application or Full Application. Nor are there any Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) within 10 kilometres of the Application Site for either of the Reserved Matters of Full applications.

Although limited by the requirement to connect two points, the route of the shared route has been designed to reduce its impact on the existing biodiversity, and whilst there is the potential for effects on habitats and species during the construction phase, appropriate mitigation measures have been detailed within the Ecological Impact Assessment (EclA) included within the Reserved Matters Application and Full Application. The new shared pedestrian and cycle route, as discussed in **section 3.2** will provide links to green infrastructure which complies with the policies within Chapter 8 of the NPPF.

There is potential for the biodiversity of the RMA Application Site to be enhanced through the creation of proposed landscape planting which will be supplemented by the mitigation and enhance measures outlined with the Ecological Mitigation Strategy⁶ within the wider Brookleigh Development. The proposals to retain habitat, where practicable, together with the replacement and enhancement planting complies with the policies within Chapter 15 of the NPPF.

Based on the above and following the mitigation proposed within the EclA submitted with the Reserved Matters and Full applications and the wider tree planting provided by the Brookleigh Development, it is considered that the Proposed Scheme is in accordance with the NPPF, the District Plan policies and Development Infrastructure and Contributions SPD relating green infrastructure and biodiversity.

⁵ AECOM (2018) Northern Arc Allocation, Arboriculture Impact Assessment (Dated December 2018).

⁶ AECOM (2019) Northern Arc Allocation, Environmental Statement Addendum, ES Volume 2, Appendix 6-15: Ecological Mitigation Strategy (Interim Draft) (Project No. 60578790, Dated August 2019).

6. Conclusion

The Proposed Scheme comprises a new pedestrian and cycle route, which forms the third phase of the Western Bridge and Link Road. Permission for the Proposed Scheme is subject to a Reserved Matters Application (pursuant to an outline planning permission) and a separate Full Application. The Proposed Scheme will make a contribution towards sustainable development in accordance with the relevant policies detailed within the National Planning Policy Framework and those outlined with the MSDC District Plan.

Policy requirements include:

- Implementation of SuDS and the consideration of the current and future impacts of climate change;
- The provision and opportunities to facilitate the increased use of alternative means of transport (non-car modes) through shared pedestrian and cycle routes and other sustainable modes of transportation;
- Provision of links to existing and future green infrastructure such as the Green Super Highway;
- The efficient use of resources including the minimising waste, maximising recycling and the re-use of materials;
- Provision of ecological mitigation and enhancement measures.

The Proposed Scheme will meet these policy requirements by:

- Providing an integrated network of SuDS taking into account the surface water drainage of the Proposed Scheme;
- Providing shared surfaces which will provide pedestrians and cyclists with connectivity and will promote the use of alternative means of transport;
- Providing strategic green connections which include pedestrian and cycle links, such as the Green Super Highway;
- Ensuring that earthworks are reduced by working with the Application Site's topography and to ensure that the environmental control and mitigation measures detailed within the CEMP with regards to construction waste are followed.
- Enhancing green and blue infrastructure through the provision of landscaping which will include tree planting.

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