

# WIVELSFIELD PARISH COUNCIL

## PLANNING OBJECTION TO ADDITIONAL COMMENTS SUBMITTED IN DECEMBER 2025

**Land to the East of Lunce Common**

**Application: LW/25/0071 / DM/25/0827**

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### **1. Failure to meet NPPF requirements for realistic and deliverable sustainable travel**

#### **Policy context**

- **NPPF paragraphs 110–113 and 116**
- Development should provide genuine choice of transport modes
- Measures must be realistic, deliverable, and appropriate to the site
- Travel Plans must be effective, monitored, and enforceable

#### **Objection**

The Travel Plan **overstates the site's accessibility by sustainable modes** and relies on generic measures that are unlikely to result in meaningful modal shift.

- Bus services are infrequent, limited in destination coverage, and vulnerable to withdrawal
- Rail stations are several kilometres away and realistically require car access
- Walking and cycling are limited by distance, road speed, and rural road conditions

Despite this, the RTP assumes residents will materially reduce car use. This is **not supported by local travel behaviour evidence** and conflicts with the NPPF requirement that transport evidence must be realistic rather than aspirational.

The plan therefore fails to demonstrate that the residual transport impacts would not be severe, as required by paragraph 116.

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### **2. Generic measures that do not reflect the rural village context**

#### **Policy context**

- **NPPF paragraph 110**

- Lewes Core Policy CP13
- Mid Sussex DP21 and DP22

## Objection

The Travel Plan relies on **standardised, urban-style measures** such as welcome packs, travel information, and promotion of walking and cycling, without addressing the **specific rural constraints of Wivelsfield, and particularly the busy nature of the road network.**

There is no credible evidence that:

- Residents will cycle on high-speed rural roads
- Walking will replace car trips beyond the immediate village
- Bus use will materially increase given current service levels

Lewes and Mid Sussex policy both require transport mitigation to be **appropriate to local character and function**, which this Travel Plan does not achieve.

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## 3. Lack of binding, enforceable commitments

### Policy context

- NPPF paragraph 113
- Lewes CP13
- Mid Sussex DP21

### Objection

The Travel Plan contains **no enforceable mechanisms** to ensure delivery or effectiveness.

Key weaknesses include:

- No secured funding for ongoing monitoring
- No penalties or fallback measures if targets are missed
- No requirement to implement additional mitigation if car use remains high
- Heavy reliance on a Travel Plan Coordinator role without guarantees of duration or authority

Without binding S106 obligations, the Travel Plan is **aspirational only** and fails policy tests requiring certainty of delivery.

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## 4. Targets are vague, unambitious, and unsupported by evidence

## Policy context

- NPPF paragraph 113
- Lewes CP13

## Objection

The modal split targets in the Travel Plan are:

- Not based on up-to-date local census or village-level data
- Not benchmarked against comparable rural developments
- Not justified in relation to current car ownership levels

Targets are expressed as intentions rather than measurable outcomes, and there is **no clear baseline survey of actual travel behaviour** once residents occupy the site.

This undermines the credibility of the Travel Plan and conflicts with policy requiring clear, measurable, and achievable outcomes.

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## 5. Over-reliance on third-party and future improvements

### Policy context

- NPPF paragraph 111
- Lewes CP13
- Mid Sussex DP22

### Objection

The Travel Plan assumes benefits from:

- Future bus service enhancements
- Wider cycle network improvements
- Potential behaviour change initiatives

However:

- These improvements are not guaranteed
- They are outside the applicant's control
- They are not secured through planning obligations

Policy is clear that mitigation must be **in place or secured**, not speculative. The Travel Plan therefore fails to demonstrate that transport impacts will be acceptably mitigated.

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## 6. Inadequate monitoring and review framework

### Policy context

- **NPPF paragraph 113**
- **Lewes CP13**

### Objection

The proposed monitoring regime is weak and time-limited.

- Monitoring periods are short relative to the lifetime of the development
- There is no commitment to long-term review
- There is no trigger for additional mitigation if targets are not met

This conflicts with policy expectations that Travel Plans should be actively managed and adapted over time to ensure effectiveness.

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## 7. Conflict with Wivelsfield Green Neighbourhood Plan objectives

### Policy context

- **Wivelsfield Green Neighbourhood Plan transport and traffic policies**
- Emphasis on protecting village/Parish character
- Reducing traffic growth
- Avoiding additional on-street parking pressure
- Protecting pedestrian safety and rural lanes

### Objection

The Travel Plan fails to demonstrate how it will:

- Prevent increased car ownership and car trips
- Avoid additional parking pressure within the village
- Protect pedestrian safety on roads already subject to high vehicle speeds

By assuming reduced car use without credible evidence or enforceable controls, the Travel Plan risks **direct conflict with neighbourhood plan objectives**, which form part of the statutory development plan.

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## 8. Cumulative impact not properly addressed

## Policy context

- **NPPF paragraph 111**
- **Lewes CP13**

## Objection

The Travel Plan assesses the site in isolation and does not adequately consider:

- Cumulative traffic growth from nearby developments including those at Fox hill and Hurst farm
- The compounded effect on local roads, buses, and pedestrian routes

It does not consider the East or West Sussex County Council traffic modelling, or the interpretation of these in the Lewes Local Plan 2020-2040 Forecasting Report. This latter shows that the B7112 onto which the proposed site would exit, is one of the busiest roads in the County, flowing towards choke points at Wivelsfield Green (village), Ditchling and Wolds end junction. It is not for example possible to appreciate whether the traffic assessments include 'induced traffic' or 'generated traffic'. 130 extra houses could, for example according to national statistics, generate 690 home deliveries per week.

These omissions weaken the conclusion that the development would not result in severe residual transport impacts.

## 9. Summary

The submitted Residential Travel Plan is **not robust, not enforceable, and not proportionate** to the scale and location of the development. It relies heavily on aspiration, future behaviour change, and third-party improvements rather than demonstrable, secured mitigation. As such, it fails to comply with national and local planning policy requirements.