

**HORSHAM DISTRICT COUNCIL LOCAL PLAN REG 19**

**WEST OF IFIELD**

**TRANSPORT REPRESENTATION  
ON BEHALF OF SAVE WEST OF IFIELD**

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## 1.0 INTRODUCTION AND BACKGROUND

- 1.1 This Transport Representation (TR) has been produced on behalf of Save West of Ifield (SWoI) to provide an examination and critique of the transport implications relating to the proposed allocations within the Horsham District Local Plan 2023 – 2040 (Regulation 19), which has been published for consultation (the 'Plan'). The Plan will cover the period from 2023 to 2040 but considers a longer-term context of up to 30 years for strategic scale development.
- 1.2 This TR focuses primarily on the West of Ifield proposed allocation (the 'Site') which is being promoted by Homes England. The proposed allocation comprises Ifield Golf Course and other greenfield land and is predominantly rural in character. The Site allocation relates to 3,000 dwellings and is being promoted as a first phase of a wider expansion of Crawley town, part of the adjacent Crawley Borough, potentially comprising 10,000 houses in total.
- 1.3 It is understood that Homes England are promoting the Site as a 15 minute neighbourhood garden town which seeks to deliver day-to-day facilities within a 15 minute walk or cycle ride for residents. The Strategic Sites Assessment Report (Dec 2023), which forms part of the Plan's evidence base, also suggests that the proposals seek to ensure that there is access to high levels of public transport including an expansion of the Crawley Fastway bus system. It is also understood that this first phase development allocation would provide the first phase of a 'potential' future western link road from the A264 to the A23.
- 1.4 The location of the West of Ifield site is shown within the context of the Horsham District Boundary within **Figure 1A**, within the context of its relationship with Crawley in **Figure 1B** and with the addition of the Gatwick Airport Safeguarding Boundary in **Figure 1C**.
- 1.5 Within regard to the provision of local facilities, the Strategic Sites Assessment Report (Dec 2023) states that the proposals will deliver a new primary school at the start of the first phase and would make land available for a secondary

school. It also states that a new neighbourhood centre with retail, community and leisure provision would be provided, although no timescales are stated for these facilities.

- 1.6 West of Ifield allocation is the largest allocation within the Plan. **Table 1** below sets out the proposed distribution for all sites in the plan period 2023 to 2040. It should also be noted that the allocation is being promoted as the first phase of a potential 10,000 dwelling site in the longer term (as noted in paragraph 10.84 of the published plan). The figures presented in the table below are those quoted in the published plan and not the numbers quoted in other evidence base documents which will also be referenced within this representation.

<b>Table 1 – Proposed Housing Allocations (dwellings)</b>		
<b>Site Allocation</b>	<b>Allocations in Plan Period to 2040</b>	<b>Overall Dwellings</b>
<b>Strategic Sites</b>		
HA2: Land West of Ifield	1,600	3,000 <sup>1</sup>
HA3: Land North West of Southwater	735	1,000
HA4: Land East of Billingham	650	650
<b>Strategic Site Total</b>	<b>2985</b>	<b>4650</b>
<b>Non-strategic sites</b>		
HA5: Ashington	75	75
HA6: Barns Green	95	95
HA7: Broadbridge Heath	133	133
HA8: Cowfold	70	70
HA9: Henfield	55	55
HA10: Horsham	100	100
HA11: Lower Beeding	43	43
HA12: Partridge Green	255	255
HA13: Pulborough	25	25
HA14: Rudgwick and Bucks Green	66	66
HA15: Rusper	32	32
HA16: Small Dole	40	40
HA17: Steyning	265	265
HA18 Storrington & Sullington	125	125
HA19: Thakeham (The Street & High Bar Lane)	65	65
HA20: Warnham	20	20
HA21: West Chiltington & West Chiltington Common	38	38
<b>Non-Strategic Site Total</b>	<b>1502</b>	<b>1502</b>

<sup>1</sup> Site has been identified as having a longer term potential for 10,000 dwellings

- 1.7 As shown, within the Plan Period some 4,487 dwellings are proposed. Of these, West of Ifield accounts for 36% of the total. Beyond the Plan period, West of Ifield accounts for almost half of all housing growth even disregarding the long term potential for 10,000 dwellings.

## 2.0 LOCAL PLAN ALLOCATION AND STRATEGIC SITE ASSESSMENT

### Strategic Site Assessment (Housing Assessment Outcomes)

2.1 Part of the evidence base for the Local Plan allocations is the Strategic Site Assessment. West of Ifield is referred to as SA101 and is covered from page 90 of this document.

2.2 Under the 'Road Transport' heading on page 99, it is noted that:

*'Roads in and around Crawley are **known to experience congestion in the area of the proposed development**, for example on the A264 corridor and routes into and through Crawley from the west. The site promoters indicate that in the longer term, should a proposal for 10,000 homes come forward, then a full multi-modal corridor incorporating a link road from the A264 near Faygate to the A23 within Crawley Borough, could be delivered. It is recognised that this would potentially require an alignment passing through land currently safeguarded for potential future expansion of Gatwick airport, albeit different route options are being explored.'* (TTHC emphasis added)

2.3 Against the backdrop of the acknowledged congestion issues, this section appears to suggest that the Council's views on the delivery of the Link Road don't fully align with those of the Site promoter.

2.4 It is suggested that the Council will continue to seek a clear commitment for the delivery of the sustainable transport corridor but it's acknowledged that the development of 3,000 dwellings (not just the 1,600 proposed within the Plan period) cannot demonstrate the land ownership / viability to deliver the full route, by which it is assumed to be the A264 to the A23.

2.5 So, from this, it would appear that the full Link Road is only an aspiration at this stage and that owing to land and viability issues there is no certainty over its delivery.

- 2.6 Matters relating to the Transport Modelling evidence base are discussed later within this representation. However, it's appropriate to note at this point that it simply isn't clear what the transport modelling has assumed with respect to the Link Road, either in its form, extent or access arrangements.
- 2.7 In any event, the lack of certainty in relation to the Full Link Road would appear to explain why the Masterplan (Figure 7 within the Local Plan document) shows only a partial link road, although even the Masterplan provisions are not clear. For ease of reference, a copy of the Masterplan is attached to this Representation as **Appendix A**.
- 2.8 As shown, the Link Road extends from a point short of the Site boundary towards the south-western end of the Site to a point close to but not connecting with Charlwood Road at the north-eastern end. It is noted that, as with the traffic modelling, there are no details provided within the evidence base of the form that this Link Road will take, its extent of the access arrangements assumed when testing the allocations.
- 2.9 The 'Road Transport' text on page 99 of the Strategic Sites Assessment suggests that 'The Site promoters are however committed to providing **a less ambitious multi-modal route** to provide access into the development from Charlwood Road.' but this again doesn't provide any details or actual commitment to anything capable of dealing with the transport demands from a 1,600 dwelling Site, let alone 3,000 houses. (TTHC emphasis added)
- 2.10 Oddly, there is no mention whatsoever of the Link Road within the Deliverability and Viability section of the Strategic Site Assessment.
- 2.11 The provision of a '*less ambitious*' route does not inspire confidence that the recognised congestion issues noted by the Council within the evidence base will not be worsened by the allocation and that its inclusion will provide anything which is capable of ensuring there would be no severe cumulative impacts as required by National Planning Policy Framework (NPPF) paragraph 115 and

the Council's Strategic Policy 23: Infrastructure Provision, which states at point 2 that:

*'Where there is a need for extra capacity, this will need to be provided in time to serve the development or the relevant phase of the development, in order to ensure that the environment and amenities of existing local residents is not adversely affected.'*

2.12 Given that any connection to Charlwood Road would appear to be in conflict with the Gatwick Airport Safeguarding zone (see **Figure 1C** and **Figure 2**), it can only be assumed at this stage that there is uncertainty even with the access connection to Charlwood Road.

2.13 Indeed, the only highway connection shown on the Masterplan is that which aligns with the existing Golf Course access off Rusper Road (which is labelled as 'Other Key Road'). This would appear to make the 1,600 dwelling allocation a large cul-de-sac development off Rusper Road.

2.14 Seemingly without any technical basis, details or commitment, the Road Transport section is concluded by suggesting that:

*'Overall, **there are likely to be favourable impacts at the strategic level, given the sustainability and transport benefits of locating strategic development close to Crawley and Gatwick which are significant trip generators within the sub-region. This is balanced against likely unfavourable impacts at the local level, given the limited road and junction capacity and worsening congestion at the local level.***' (TTHC emphasis added)

2.15 Within the Summary section of the Strategic Site Assessment on page 103, it is suggested that the Site can be readily connection to the existing public transport networks, despite this not having been demonstrated, and that the Site is relatively close to Ifield Station. In practice, the Site isn't actually that close to the station as can be seen in **Figure 3**, which shows that no dwellings



would be within an 800m walk to the station, and only a small part of the Site would be within 1200m.

- 2.16 The Summary also suggests that the scheme has been assessed as financially viable but clearly such viability will be directly linked to the assumptions which have been made regarding the facilities and infrastructure needs of the allocation.

### **Local Plan Allocation (HA2: West of Ifield)**

- 2.17 With the above in mind, it should be noted that the West of Ifield site is promoted under Strategic Policy HA2 and that the supporting text for the policy (at paragraph 10.85) suggests that:

*'...it is a highly sustainable location for development and is therefore allocated for approximately 3,000 homes, of which it is envisaged approximately 1,600 homes would be delivered during the Plan period.'*

- 2.18 It is also stated in paragraph 10.86 that:

*'The scheme will enable and be served by extended high quality and high frequency Fastway bus routes to jobs, services and facilities in Crawley and beyond, providing more travel choice and delivering environmental benefits to existing communities.'*

- 2.19 More detail regarding the timing of the bus facilities is provided in paragraph 10.95 which notes that the Site will:

*'...from the very first phases, ensure the provision of high quality bus, cycle and pedestrian links to key destinations outside the site, including Crawley town centre, Manor Royal business park, Ifield train station, and Horsham Town.'*

- 2.20 However, no details of what bus provision or associated facilities to achieve 'Fastway' standard are provided. These are important considerations given the

reliance the allocation has on such provisions. It is even more relevant in the context of the existing high car ownership in Horsham, which is recognised by the Council in paragraph 8.9 of the Local Plan and which is higher than West Sussex as a whole, the South East Region and well above the UK average.

2.21 Again, having regard to the earlier noted uncertainties in respect of the transport provisions the Allocation will deliver, Paragraph 10.96 notes that:

*'Evidence from strategic transport modelling shows that to deliver the Land West of Ifield, significant mitigation will be necessary to mitigate the impacts on the local road network. The proposals include as a minimum the development of a multi-modal route to be delivered within the site. Its initial main purposes will be to provide the main vehicular access to the development, and to facilitate new bus, cycling and walking links through the site and integrating with the wider movement network. Delivery of the corridor must be delivered 'up front' within the first phase of the development, in order to ensure that the environment and amenities of existing or new local residents is not adversely affected.'*

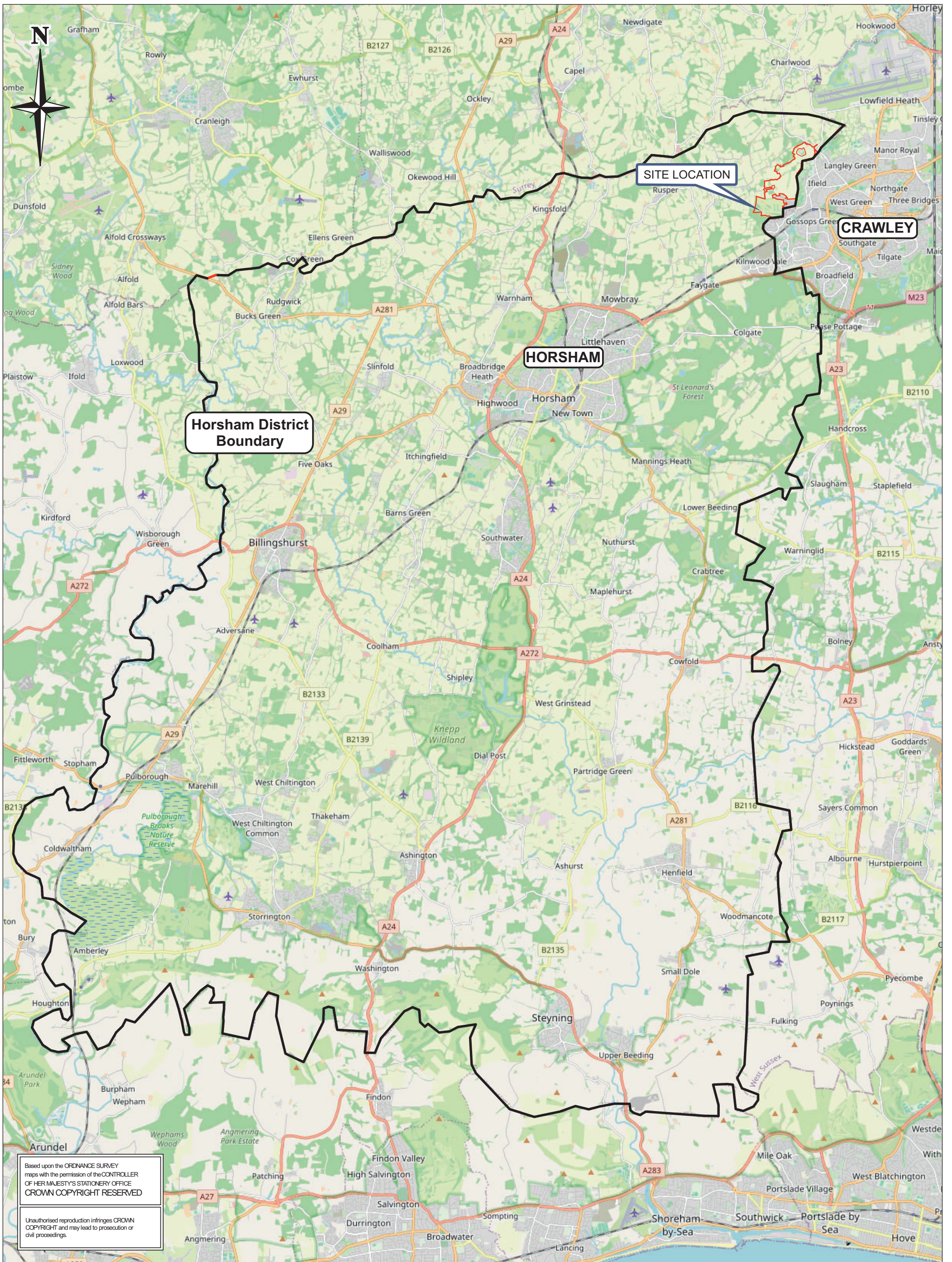
2.22 This is further reinforced in paragraph 10.98 which recognises that development of new homes and associated infrastructure in this area will have an impact on traffic movement both within Ruser Parish and Crawley town and that the design of the road network into, within and beyond the development must take these factors into account.

### 3.0 HORSHAM TRANSPORT STUDY

- 3.1 The Horsham Transport Study (HTS) has been produced by Stantec on behalf of Horsham District Council to provide support for the Local Plan. Using a SATURN highway model, an assessment has been conducted to assess the impact of development scenarios on the West Sussex County Council local highway network and Highways England's Strategic Road Network.
- 3.2 In order to ensure that a transport model is suitable for future forecasting, it will first be subject to a process of validation. Details of the validation assessment are set out in a Local Model Validation Report (LMVR).
- 3.3 In respect to of the HTS, a series of reports are provided within the evidence base. The December 2022 document makes reference to the LMVR being provided within Appendix B. However, the report which is included within Appendix B is marked Draft and is entitled Data Report. Within the contents list of the Data Report there are two references to validation, the first being section 5.2 Initial Validation by Telefonica and the second 5.3 Additional Validation.
- 3.4 With section 1.2.2 it is stated that '*Further information on the development of the 'Base Year' model will be provided within a Local Model Validation Report, on completion of this stage.*', which suggests that the Data Report would be followed up with an LMVR. However, no other report within the evidence base is provided in the form of an LMVR.
- 3.5 Within section 5.2 of the Data Report, the initial validation by Telefonica is described as looking at the dataset for the whole of West Sussex whereas the HTM is only interested in a subset of this region. There then follows some text which has been struck through which suggested that PBA have carried out similar validation checks to those undertaken by Telefonica, on the data but on the data for the HTM Study Area. It is then stated that the 'initial' validation checks undertaken by Telefonica are sufficient to validate the Horsham Model.

- 3.6 Although the contents list of the Data Report suggest a further sections 5.3 Additional Validation, this is not provided. Also, Appendix C of the Data Report was to include a 'Mobile Phone Data Validation Technical Note', which is also missing.
- 3.7 It appears that the LMVR is missing from the evidence base. Until such time as TTHC has been able to review the LMVR it is not possible to comment on the validity of the model and its suitability in producing forecasts to test the proposed allocations. TTHC would therefore request that follow-up comments may need to be made once the LMVR has been reviewed.
- 3.8 With regard to other documents within the HTS package, as noted earlier, it is not clear what infrastructure schemes have been assumed within the model assessment work undertaken. Again, TTHC would request that follow-up comments may need to be submitted once such inputs are clear.

# Figures



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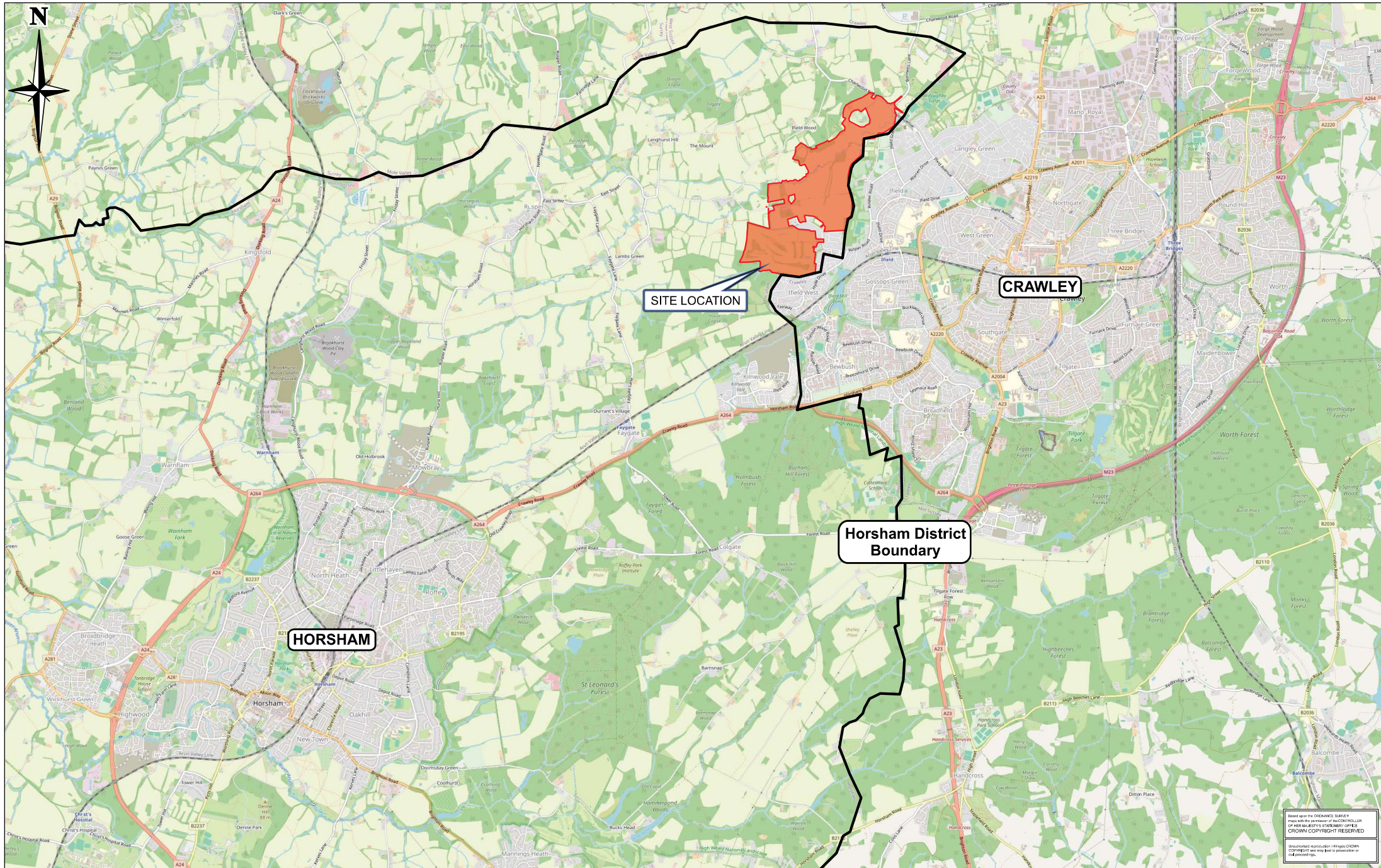


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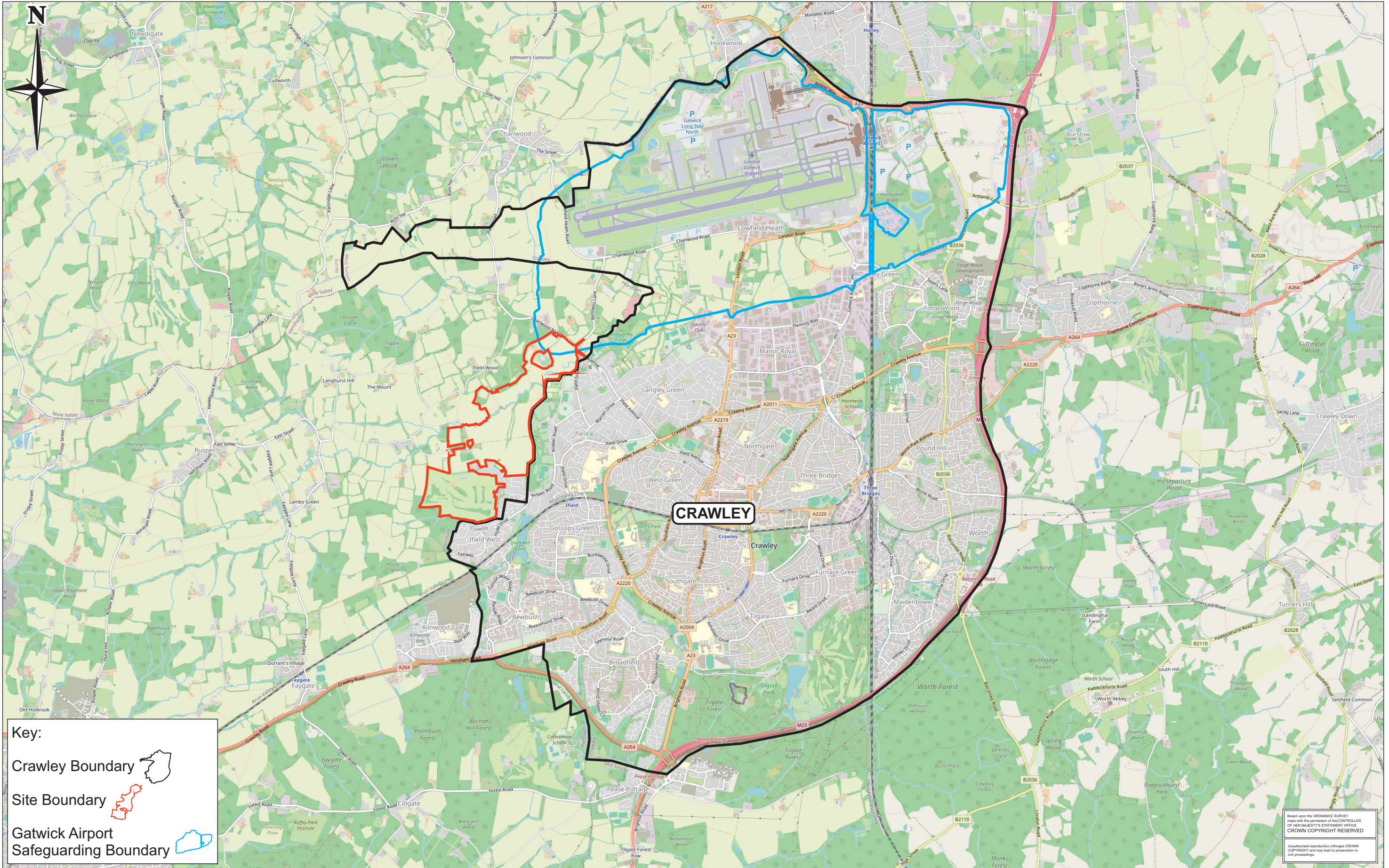
WEST OF IFIELD, CRAWLEY

SITE LOCATION (WITHIN HORSHAM DISTRICT BOUNDARY CONTEXT)

FIGURE 1A



Drawing No	M24004-C-005	Rev	.
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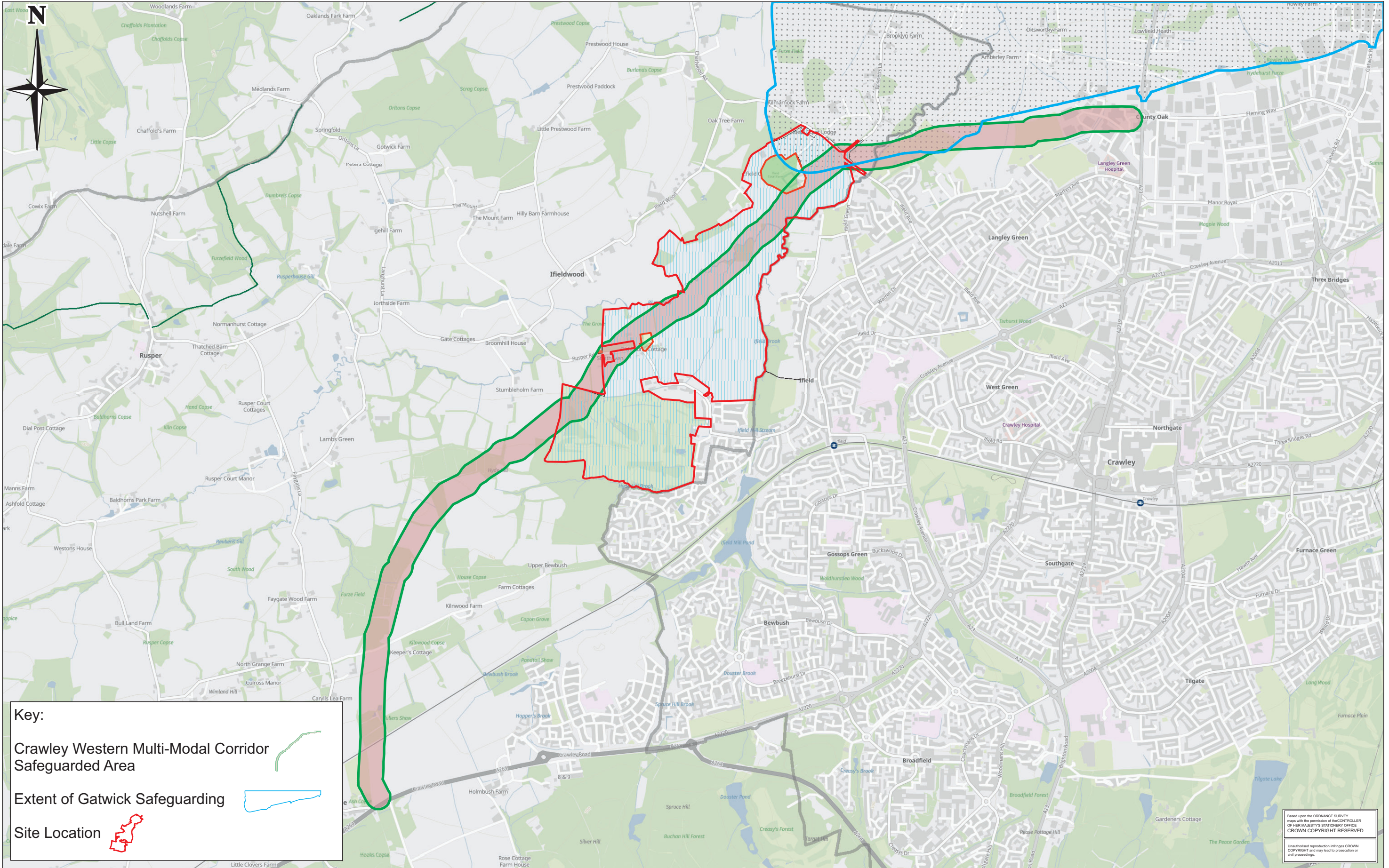


WEST OF IFIELD, CRAWLEY

SITE LOCATION (INCLUDING GATWICK AIRPORT SAFEGUARDING BOUNDARY)

FIGURE 1C





**Key:**

Crawley Western Multi-Modal Corridor Safeguarded Area

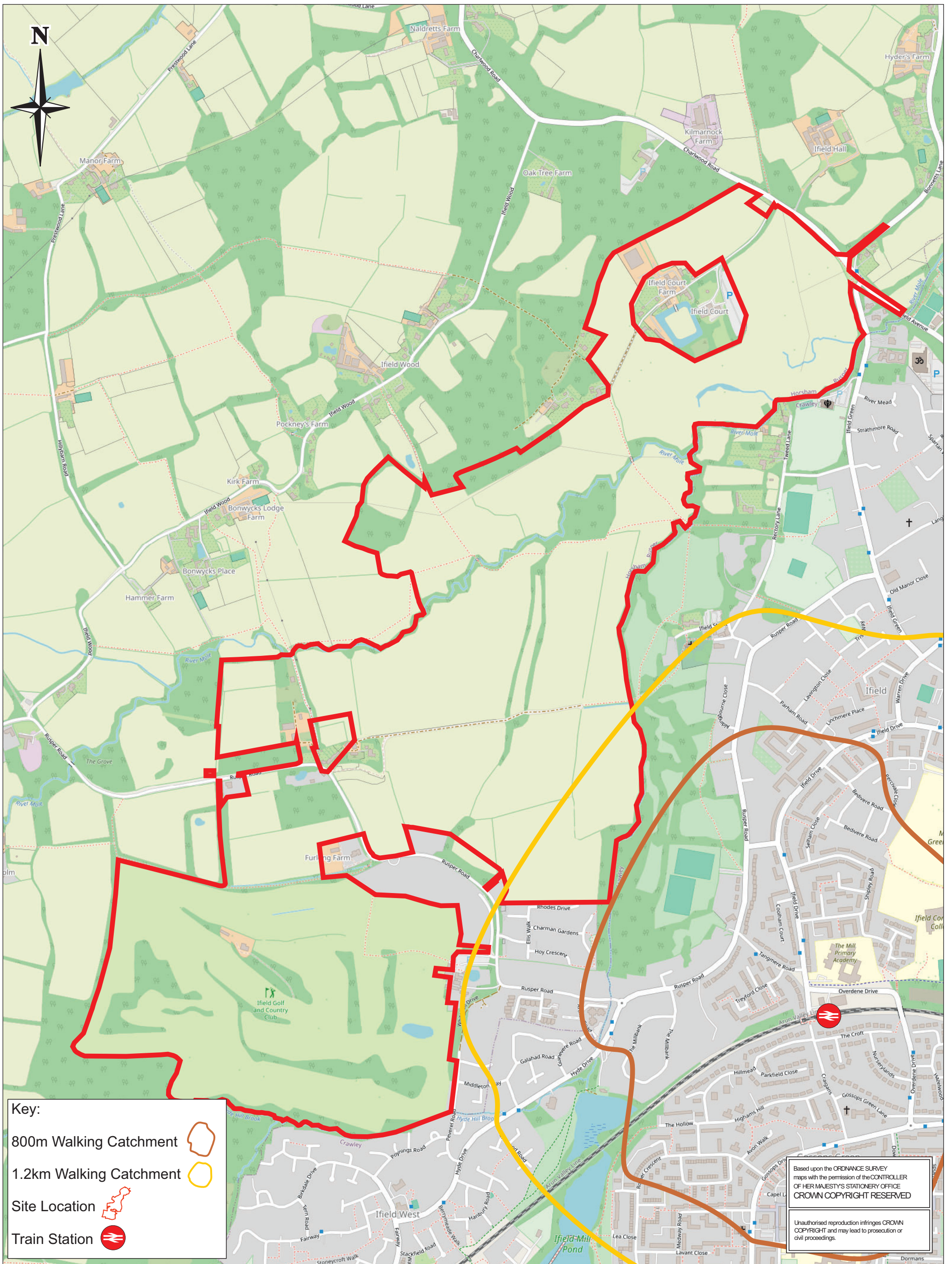
Extent of Gatwick Safeguarding

Site Location





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<b>WEST OF IFIELD, CRAWLEY</b> <b>LINK ROAD PLAN</b> <b>FIGURE 2</b>				




**Key:**

- 800m Walking Catchment 
- 1.2km Walking Catchment 
- Site Location 
- Train Station 

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 <p>the Traffic, Transport &amp; Highway Consultancy</p>	Drawing No	Rev	WEST OF IFIELD, CRAWLEY	
	M24004-C-014	.		
	Date	Rev Date	FIGURE 3	
	29.02.2024	.		
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# Appendix A

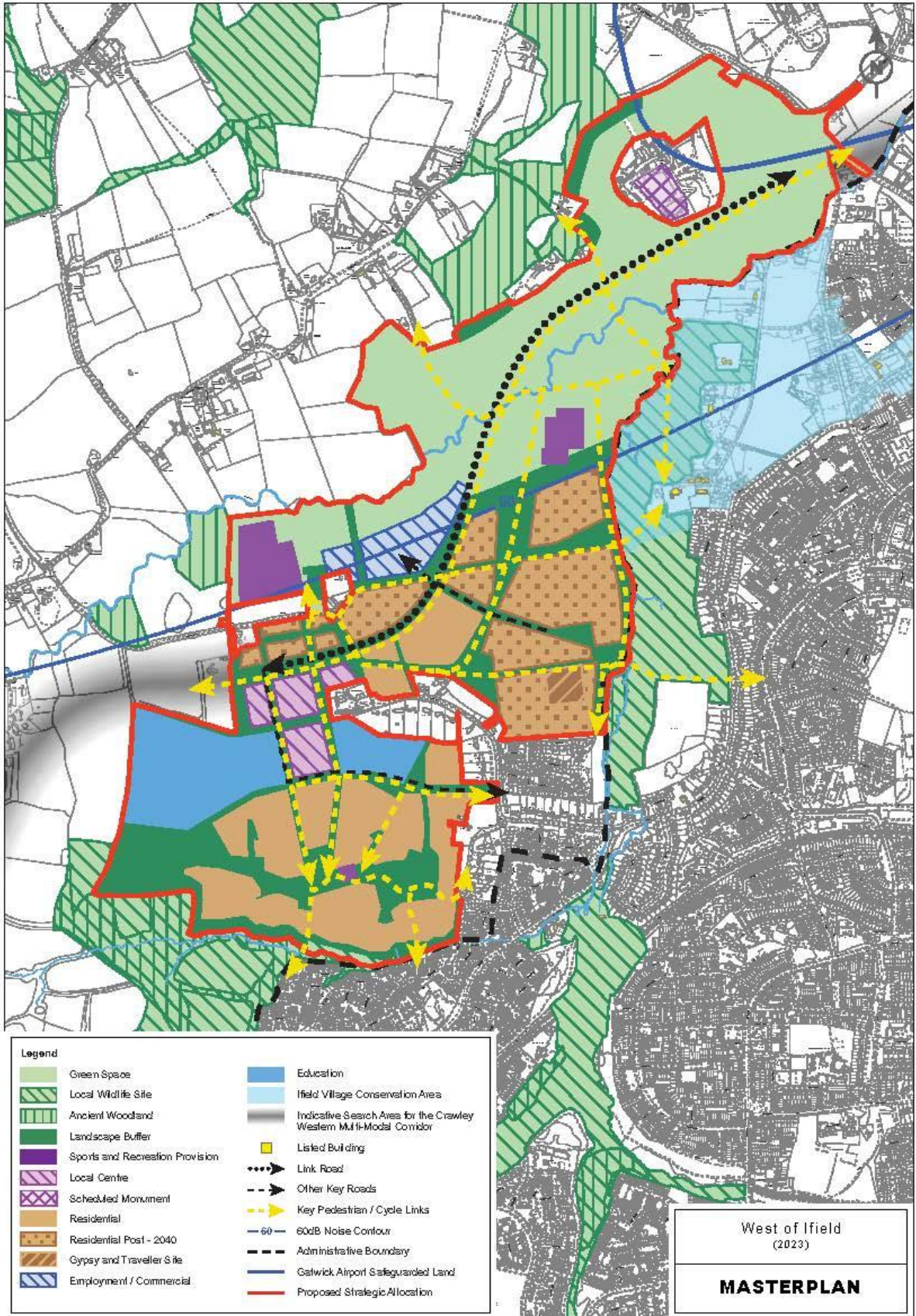


Figure 7: Land West of Ifield Masterplan