

**Horsham District Council Local Plan Reg 19 Response  
Save West of Ifield - Transport**

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# Horsham District Council Local Plan Reg 19 Response

## Save West of Ifield - Transport

### 1. Introduction

This document is a response to Horsham District Council's draft Local Plan Reg 19 consultation. It is focused on Transport related elements of the Homes England proposals for 3,000 houses West of Ifield (with possibility of increasing to 10,000). It references the HDC draft Local Plan elements that need consideration in terms of objections, inclusion/exclusion, additions etc. It is noted that Homes England's original proposals were for 3,250 houses but that the figure was changed to 3,000 in their public consultation carried out in October 2022.

This response is prepared by members of the 'Save West of Ifield' campaign: [Save West of Ifield](#).

The focus is mainly on West of Ifield's physical position as a new neighbourhood of Crawley, and the transport and traffic implications of that. But the response also touches on the significant increase in traffic on the country lanes of Rusper parish, and the fact that they are already heavily used at rush hours making them very dangerous for cyclists, walkers and equestrians. This wider impact on Rusper parish is addressed in more detail in Supporting document A: *Technical note No 1 Rusper Parish Council - Highways and Transport Technical Advice Land West of Ifield, Crawley* prepared by Alan Bailes Consultancy Ltd.

The response is also accompanied by Supporting document B: xxxx prepared by the Traffic Transport and Highways Consultancy.

#### 1.1 Horsham District Council draft Local Plan

This response is based on the 'Horsham District Council (HDC) local plan 2023 – 2040 Regulation 19 (December 2023)' published on 3<sup>rd</sup> December as part of the HDC Cabinet meeting of 11<sup>th</sup> December 2023.

#### Status of the Homes England proposals

This response is informed by the various Homes England information released up to and including the consultation that took place in October 2022. Various different proposals and information have been released at different times making it difficult to identify the specific current information. Current, December 2023, proposals/information is based on 3,000 houses and a partial 'Crawley Western Link' or 'Western Multi-modal corridor' (previously 'Western Link Road') between Rusper Road and Ifield Avenue/Ifield Green.

It is not clear from the Local Plan, whether HDC will adopt the two different site proposals from Homes England i.e. the 3,000 and the 10,000 house sites, although 'Strategic Policy HA2: Land West of Ifield' proposes the 3,000 house site and reference is made to possible expansion to 10,000 homes in a future Plan. Comments are, therefore, based on both possible allocations, but primarily focussed on HA2.

### 2. Policies and Guidance relevant to Transport

#### 2.1 HDC Local Plan – Transport Infrastructure

'3.20 Non-car-based transport including walking, cycling and community transport services are prioritised to help reduce the reliance on private motorised vehicles and contribute to low carbon based futures and healthy lifestyles. The transport infrastructure, especially the active travel network and public transport, is continually improved to offer high-quality, walking and cycling facilities and reliable and frequent public transport services. IT and communication facilities are developed to support a sustainable, resilient economy, including opportunities for people to live close to where they work. Transport networks will be designed with electric vehicles and other changes in technology in mind.'

'Strategic Policy 20: Development Principles

10. Provides pedestrian, cycle and public transport priority over the use of private motor vehicles, incorporating the provision of safe recreational/utility routes, public rights of way and connectivity within the development and to the surrounding area; '

'Strategic Policy 24: Sustainable Transport

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8.7 Access and ease of movement, especially by active travel, are important considerations in good place-making and, therefore, in creating strong, safe and healthy communities. Streets must be designed around people, not vehicles. In particular, perceived road danger is a deterrent to active travel and must be improved upon. Active travel (primarily walking, cycling and wheeling) reduces carbon emissions, improves local environments, and helps communities become healthier and more inclusive: this should be the natural first choice for short trips. This policy will seek to ensure that sustainable forms of transport are considered in the first instance, with the provision of safe walking and cycling facilities as a priority.

8.8 Policy 24 and the wider spatial strategy seek to establish patterns of development that improve opportunities for home working, local journeys within neighbourhoods, walking, cycling, wheeling and the use of public transport. This includes electrically assisted pedal cycles (e-cycles) and scooters. The Council supports the 20 minute neighbourhood concept, and also supports low-traffic neighbourhoods and, where suitable, 'homezones'. All new development should also seek to achieve safe, attractive and direct links to existing and planned cycle and pedestrian routes and networks.

8.9 Whilst a particular challenge for Horsham District is the high level of car ownership, there is opportunity to reduce car use through making other, lower-carbon forms of travel more attractive. Cars will continue to play an important role. Electric vehicles are becoming mainstream and their rollout contributes to net zero carbon. The Council will support electric car use wherever possible.

8.10 Bus services in most parts of the District are limited, and given possible future cuts in funding, new development should work hard to improve this, particularly given the role of buses in supporting independence for older people. This includes, where appropriate, supporting Demand Responsive Transport Services to connect our rural communities. The Arun Valley railway line runs through the District and there are eight stations most of which have relatively frequent services. However, much of the east of the District does not have direct access to a railway station and opportunities to improve access should be sought. For larger development proposals there is an expectation that mechanisms to achieve high uptake of bus and train travel will be provided at an early stage of operation.

8.11 For developments that generate significant amounts of movement, interventions should be documented in a Transport Assessment or Statement submitted in support of the application, and a Travel Plan produced to ensure measures are implemented and sustained. These must prioritise active travel, and ensure that all new development is well-connected to wider cycling and walking networks, including appropriate contributions to support off-site improvements. Impacts on the wider strategic road network may also need to be considered.

8.12 The West Sussex Transport Plan 2022-2036 sets out the strategy for guiding future investment in highways and transport infrastructure across West Sussex. It also sets a framework for considering transport infrastructure requirements associated with future development across the county. The Council will work with West Sussex County Council and other transport and service providers and developers to improve accessibility to key services and facilities and provide an improved and better integrated transport network. Investment in improvements to active travel and public transport should be prioritised.

8.13 The strategic improvements listed below have been identified as necessary in the medium to long term to ensure that roads and junctions in the District operate safely. Improvements to active travel networks are equally important and will be identified in the Infrastructure Delivery Plan. All improvements (strategic or otherwise) should be designed to provide safe and attractive passage for pedestrians and cyclists following the guidance contained in Local Transport Note 1/20 – Cycle Infrastructure Design (LTN 1/20), or any future updates. These will be facilitated primarily by the development of strategic sites, and supported as necessary through further developer funding:

'.....

- A 'middle section' Crawley Western Multi-Modal Corridor, as part of the West of Ifield development
- A full Crawley Western Multi-Modal Corridor (sections of which may be delivered beyond the Plan period)
- .....

1. Development will be supported provided the following is demonstrated:

- a) For residential development, the need for travel is minimised through provision in all homes for home working, including bespoke-design space within the home and gigabit capable broadband connection;
- b) The layout, design and location of facilities and infrastructure prioritise the ability of residents and workers to safely and conveniently walk and cycle to meet their day-to-day work, shopping and leisure needs;
- c) Walking and cycling routes are designed to be safe, attractive, direct and legible, have priority over motorised traffic, and integrated with the existing and wider network;

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- d) Where feasible, provision is made for bus travel and infrastructure within the development, to include as appropriate the provision or improvement of bus stops and weather-proof shelters, information on service schedules, and bus priority over other motorised traffic movement;
- e) All opportunities have been explored to maximise access to passenger rail services, primarily by walking, cycling and bus, but if appropriate by private car including the enhancement of rail station car parking where feasible;
- f) Innovative approaches to sustainable movement and communication are fully considered, including demand responsive rural transport services where scheduled services are not feasible, on-demand cycle, e-cycle and scooter hire, and electric bus.

2. Development will be supported where it demonstrates how the priorities and principles set out in the National Model Design Code, West Sussex Transport Plan 2022-36, LTN120, Cycle Infrastructure design, and Local Cycling & Walking Infrastructure Plans (LCWIPs), or any subsequent updates have been adhered to. The design of these facilities must be in accordance with the National Design Guide and the National Model Design code or any subsequent updates.

3. Proposals for major development shall be accompanied by a transport assessment or statement. Where the potential impact of the development on the network is deemed to be significant, or as a result of needing to address an existing local traffic problem, a Travel Plan will need to be prepared. These should prioritise active travel, followed by public transport, and should be prepared in line with advice from the Local Highway Authority.

#### **'Strategic Policy HA2: West of Ifield**

10.95 The site is of a scale which provides an opportunity to achieve a degree of self containment, with many day-to-day journeys being made locally, but 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. Applicants should also be mindful of both the Horsham and Crawley LCWIPs and wider transport aspirations and link in with these strategies. It will be important for the development to locate places of work, shops and community facilities to maximise convenience of travel within the site. To promote sustainable and active travel modes, the scheme design will prioritise movement within the site by walking and cycling, with motor vehicles being required to give way to non-motorised traffic on most routes. Walking and cycling routes should seek to include off-road provision and 5km exercise circuits to help promote healthy lifestyles.

10.96 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.

10.97 It is recognised that a proposal for 3000 homes is unlikely to be able to deliver a full Crawley Western multi-modal corridor that connect the A264 at Faygate to the A23 south of Gatwick Airport, north of County Oak. Within the wider Gatwick Diamond area, it is recognised that other development may have the potential to come forward during the plan period (such as further growth of Gatwick Airport) and therefore other requirements or funding for this route may emerge during the plan period. Land is therefore safeguarded in the plan to allow for the delivery of such a road. An indicative safeguarded area of search for the full corridor is shown on the Policies Map.

10.98 It is recognised 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. The design of the road network into, within and beyond the development must take these factors into account.

### **2.2 Compliance with Government Policy**

#### **National Planning Policy Framework (NPPF)**

The relevant paragraphs include the following:

Paragraphs 24 – 27 “Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries” and further guidance is contained in the Planning Practice Guidance (PPG) .

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Paragraph 31 maintains that a plan should be underpinned by relevant and up-to-date evidence, including a Sustainability Appraisal that meets the relevant legal requirements.

All Cycle and Active Travel routes should comply fully with Government policy including:

Gear-Change:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf)

Local Transport Note – LTN 1/20

<https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

For elements that are within Horsham's boundaries reference should be made to HDC's LCWIP document and elements that are within Crawley's boundaries reference should be made to CBC's LCWIP document to ensure that any new paths connect to existing or planned paths e.g., Ifield Avenue cycle path:

*Local Cycling and Walking Infrastructure Plan | Horsham District Council*

<https://www.horsham.gov.uk/planning/local-cycling-and-walking-infrastructure-plan>

*Crawley LCWIP*

[https://crawley.gov.uk/sites/default/files/2020-07/Crawley%20LCWIP%20Full%20report\\_0.pdf](https://crawley.gov.uk/sites/default/files/2020-07/Crawley%20LCWIP%20Full%20report_0.pdf)

Compliance will ensure fully segregated walking and cycling paths.

WSCC plans are contained within their Draft LCWIP which should also be referenced.

*Draft – WSCC Local Walking and Cycling Infrastructure plan (LCWIP)*

<https://yourvoice.westsussex.gov.uk/26705/widgets/77425/documents/46777>

### **3. The Evidence Base**

#### **3.1 Transport modelling**

The modelling undertaken (by Homes England) has been done using the Crawley Town Transport Model, based only on a partial relief road (as per the 3,250/3,000 unit West of Ifield proposal), which does not provide an alternative route to the A264. Therefore, traffic from the west would need to use roads in Crawley (as is the current situation). The Homes England Transport Assessment [link/reference needed] concludes that the full relief road or further, more ambitious sustainable transport measures are likely to be required to mitigate the impact of the West of Ifield development for junctions in Crawley. This also therefore needs to be modelled based on the additional dwellings and the additional jobs West of Crawley Strategic Delivery if the 10,000 new homes and 10,000 new jobs proposals are brought forward. It will also be necessary for Homes England to deliver the relevant infrastructure improvements before any significant development takes place if it is to achieve its '15-minute' neighbourhood ambition. If it fails to achieve this then the whole site will not be viable due to the resulting significant numbers of motor vehicles in a development that is not designed for it. This would be a catastrophic failure in terms of the site, and for the neighbouring areas including Crawley, Rusper, Faygate and Horsham.

- Are the car trip reduction rates identified in the Transport Assessment realistic? They show a very high car trip reduction of between 12 – 15 % based on all of the sustainable transport measures identified being utilised. There are clearly errors, omissions and inaccurate assumptions in the attractiveness of these alternatives and further comment on these assumptions and how realistic they are is made in this document.
- Page 49 of the Crawley Infrastructure Plan May 2023 (CIP) reports "The Study includes sensitivity testing for the impact of a Crawley Western Link Road / Multimodal Transport Link between the A264 and A23. This finds that the Link would provide some relief at most locations under Scenario 3, with the western minor roads being the main beneficiaries. This testing does not take into account development to the west of Crawley exceeding that considered in Scenario 3 (i.e. West of Ifield (3,750 Dwellings) and West of Kilnwood

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Vale (1,546 dwellings).” It also recognises that “Existing capacity issues on roads within Crawley will potentially be exacerbated due to the cumulative impact of additional major development which is being promoted to the west of Crawley, and the significant growth in passenger numbers which is anticipated in Gatwick Airport’s draft Master Plan.”

- There clearly remain many outstanding issues in order to conclude on the transport impacts of the development. The Transport Assessment identifies the following next steps that are relevant to the site once the preferred options are developed:
  - Further investigation within modelling of impacts of reassignment when adding additional capacity.
  - Test of additional large-scale highway mitigation required to support the delivery for specific strategic locations e.g., Ifield Relief Road.
  - Further review of specific sustainable transport mitigation e.g., review of potential of specific high-quality public transport measures on specific corridors – assessment of potential additional mode shift requirements to remove need for highway mitigation e.g., Ifield Avenue and A23 corridors.
  - Further consideration of specific junction mitigation, included high level design and costings
  - Identification of any locations which are seen as accident hotspots and consideration of safety mitigation schemes

These next actions are noted but it would be inappropriate to allocate this site for development prior to completion of this work. It is necessary to know now what transport infrastructure is required to support the development as it currently appears inappropriate that a development of the scale of WOI (3,000/3,250 homes) would be accessed solely from local roads which is not appropriate.

The Transport Assessment should also take into account:

- That baseline data must include the combined effects of all new development in the area; North Horsham, Kilnwood Vale as well as the 3000 site. North Horsham is not yet built out to its full capacity but is already generating additional traffic through the village of Rusper. Kilnwood Vale, not yet been completed, and is also contributing to the traffic in the area.
- The impact on the villages of Rusper and Charlwood as these are likely to become the ‘rat-runs’ for people heading respectively to Horsham and to towns further north. These villages already suffer from higher levels of traffic than is safe and their centres are conservation areas.
- For traffic heading towards Crawley the impact will not only be felt on Ifield Avenue but also on the residential roads through Ifield and Langley Green neighbourhoods, which are already used as rat-runs.
- The knock-on effect of the potential closure of Rusper Road must be factored in. This will increase the use of Ifield Wood Road, Charlwood Road, Bonnet’s Lane, Ifield Avenue, and residential streets in Ifield and Langley Green.

### **3.2 Roads / Crawley Western Multi-Modal Transport Link (CBC Local Plan) aka ‘Crawley Western Link’ formerly ‘Western Link Road’**

#### **Crawley Western Multi-Modal corridor**

#### **Reference [HDC draft Local Plan] P88 8.13, P125 Strategic Policy 24 – Sustainable Transport**

This is depicted in the Homes England documentation/proposals as two lanes in each direction – one for buses and the other for all other vehicle types, with adjacent segregated cycle and foot lanes in both directions. It is not clear whether this will be a 20-mph limit road, although it has been suggested that it will be, or whether the speed limit will be enforced?

The Crawley Western Multi-Modal Transport Link will connect to Rusper Road in the southwest and Charlwood Road in the North East (between Ifield Green and Bonnets Lane). The original proposals for the Western Link Road showed it originating near Faygate and linking to the A264. The current proposals show the western end of the Crawley Western Link joining the Rusper Road to the north/west of the Golf club entrance, with Rusper road being closed to through traffic at this point except for buses (and presumably cyclists). This is clearly a change to the original thinking for the ‘relief road’ and questions whether it would be able to act as a relief road at all or address existing problems with congestion on the A264 between Horsham and Crawley.

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There is already significant legacy congestion on the road system including the A264/A23 to/from Horsham and many neighbourhood roads in Crawley especially Rusper Road, Ifield Avenue and Ifield Drive. There are questions regarding the purpose of the Western Link Road – is it a by-pass or a neighbourhood street? The original purpose when the road was conceived was as a ‘bypass’ but the Homes England initial designs make it look more like a neighbourhood street, in which case will it have the appropriate capacity to function as a bypass? Clarity is needed on this as there is already a large legacy demand from traffic between Horsham (Faygate roundabout) and Crawley (Manor Royal, Town Centre etc).

This configuration also raises questions as to whether the existing travel demand to/from the A264 Crawley to Horsham Road will use this road? What impact will this have on volumes, pollution, congestion etc? All of these will impact on the quality of life in the new neighbourhoods. And would some of this demand use the Ifield Wood Road and surrounding country lanes instead? All of which are not suitable for volume traffic – see section 4. Impact on Rural Roads and Villages – Alan Bailes Consultancy Ltd.. Has the transport modelling included this changed configuration and, if so, will the model work properly with the anticipated volumes?

More importantly, since the 2020 Statement of Common Ground there has been no conclusion to the question of joint highway infrastructure requirements. The Transport Study prepared for the Crawley Local Plan considered a modelled scenario (scenario 3) which included 3750 houses West of Ifield and concluded: “In Scenario 3 flow increases are predicted on the minor roads to the west of Crawley, including Rusper Road, Ifield Green, Ifield Avenue and Ifield Drive, reflecting the proposed West of Ifield and Kilnwood Vale developments located in Horsham District. Capacity constraints on Crawley Avenue are likely explain the use of the minor roads. Increases in flows are also evident in Scenario 3 on Ifield Avenue on the approach to Crawley Avenue, mainly due to the proposed West of Ifield development. This would be expected to put pressure on junctions along Ifield Avenue particularly at its junction with Crawley Avenue. A sensitivity test that considers the potential network impacts of a Crawley Western Link Road (CWLR) as part of mitigation for Scenario 3, is reported in Section 9”.

Section 9 concludes “The overall conclusion is that the scheme provides relief to the minor roads to the west of Crawley such as Faygate Lane and Rusper Road, but it does not relieve traffic flows in Crawley sufficiently to mitigate the impacts of Scenario 3 Local Plan to levels similar to or better than the Reference Case.” The reference case was as follows:

“The Reference Case has been defined to include the following:

- Completions (2015 – 2020).
- Unbuilt consented development on allocated sites.
- Unbuilt consented development on other sites.
- Strategic consented development in neighbouring areas, such as remaining build out for Kilnwood Vale (Horsham District Council) and Land West of Copthorne (Mid Sussex District Council).
- Allocation sites in neighbouring planning authorities, such as Horley Business Park (Reigate & Banstead Borough Council)”

The housing figures are slightly higher than the 3000 proposed in this plan, however policy HA2 will not deliver the full Crawley Western multi-modal corridor which in any case will not mitigate traffic impacts as indicated in the Crawley Transport Study.

What is the timing of the delivery of the Western Link Road? Homes England initial proposals for the 3250 unit development on Ifield Golf Course and the former New Town commission land suggest that the section along the edge of this site up to Ifield Green near to the junction with Ifield Avenue would be delivered initially. However, this does not resolve the routing East into Crawley and Manor Royal. Nor would it carry any traffic from the A264 in Faygate where congestion on the access to/from Crawley is significant before any further development. The October 2022 consultation suggested that the road will be built in Phase 2 – years 3 to 7, but this is too late. The road will be needed at Phase 1 to carry construction traffic and ensure that it uses the new road and not Rusper Road, Ifield Wood or other existing roads other than Ifield Avenue.

In support of the regulation 19 version of the Plan there is a new Statement of Common Ground between Horsham and Crawley. Particularly relevant to the West of Ifield allocation is paragraph 7.3 (f):

Given potential cross-boundary impacts, the parties agree that the following key objectives would be pursued in any policy formulation should HDC decide to allocate the site, and in any discussions with the site promoter:

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f) The parties will work together, with the Highways authority to ensure that any masterplan prepared by the site promoter secures an effective transport strategy to serve the development.

This will deliver a multi-modal sustainable transport route that delivers active travel options and mitigates adverse impacts of traffic flow into Crawley. The new route must not be an obstacle to the delivery of a comprehensive new corridor link to the west of Crawley, that would connect the A264 near to Faygate to the A23 north of County Oak.

Both HDC and CBC will continue to work jointly to seek a clear commitment from Homes England or other appropriate government bodies to the full delivery of the sustainable transport corridor link to support the scale of development proposed in any allocation. To support such a commitment this will include any necessary safeguarding of land within respective Local Plans, and consideration of funding models including developer contributions. The parties are engaging with WSCC and Gatwick Airport regarding the boundaries of safeguarding, especially in the vicinity of the multi-modal sustainable transport corridor link along the southern boundary of the airport.”

But there is no agreement of investment from Crawley to support any infrastructure provision and the Regulation 19 version of the plan states in paragraphs 10.12 and 10.13 that Horsham cannot contribute to meeting Crawley’s housing needs, only that through the delivery of development at Land to the West of Ifield a new school can be provided to support economic growth. As a paper exercise it can be stated that this allocation only contributes to Horsham’s housing supply, which, as set out by the Standard Method Horsham is unable to meet. However, if we consider the relationship of this housing allocation and Crawley it is undeniable that they are geographically linked and that they will be dependent on one another for shared facilities, services, and employment and as such the allocation contributes to the housing needs of Crawley more than any existing need within the existing settlements of Horsham in particular Ifield. More significant will be the relationship between Land West of Ifield and the existing transport Infrastructure much of which is in Crawley is already unable to support existing urban development in Crawley.

The Plan does not address the necessary transport infrastructure needs of the allocation Land West of Ifield. Duty to Co-Operate has not provided any significant joint solutions for managing transport infrastructure impacts cross boundary. The plan denies that the West of Ifield allocation meets the need for housing in Crawley. The houses in the allocation are not all deliverable during the plan period and highway mitigation such as the Crawley Western multimodal corridor that connect the A264 at Faygate to the A23 south of Gatwick Airport, north of County Oak is not dealt with and has been deferred. As such the plan is not Effective and fails one of the tests of soundness.

In conclusion there is a danger that a decision is based on this site without proper consideration of the implications of development both at West of Ifield (3,250 or 3,000 units) and West of Crawley Strategic Delivery (10,000 units). It is also unclear at what point this wider link would be delivered. There remain many unanswered questions in respect of highway safety and capacity.

Can the West of Ifield 3000/3250 site/area function within capacity without the link road – has this been properly considered?

What are the implications of the wider infrastructure requirements related to the Western Link Road? What are the benefits of this link – is it solely required to support the new development? Is it an appropriate location? What are the landscape impacts?

Has the development as a whole and the Western Link Road taken appropriate account for the need for the future expansion of Gatwick? And does this include the DCO process to enable use of the Northern runway?

### **3.3 Buses**

#### **Reference [HDC draft Local Plan] P89 8.10, Strategic Policy 4 – Sustainable Transport**

There is no clarity/information available regarding bus routes, the frequency of the service or even whether there will be high quality bus stops (including shelter from bad weather and RTPI). All these elements are needed to form part of an Active Travel neighbourhood.

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Much congestion is caused by the 'school-run' twice a day. In order to ensure that Active travel targets are reached it will be necessary to have school bus runs, especially during the early phases of any development when some children will inevitably be attending schools in other neighbourhoods and locations. Indeed, there is no guarantee that pupils will actually attend the schools in the neighbourhood and may wish to travel elsewhere. Equally the Homes England schools proposals refer to providing solutions for legacy demands for school places implying that pupils will be coming into the West of Ifield from other parts of Crawley and Horsham. All of these will need to be served by school buses, that are affordable to the residents affected.

It is not confirmed whether there will be a Bus gate on Rusper Road and, if so whether it will be available to emergency vehicles and cyclists. The bus gate will require existing residents to make big detours and clog up existing roads.

Crawley is shortly due to receive Hydrogen powered buses, which will help with reducing greenhouse gas emissions. But to have a useful service for all type of resident it will be necessary to have higher frequency services running across longer periods of the day. Currently the service frequency of buses in Ifield drops in the evenings and on Sundays which is not acceptable if residents do not have cars.

The existing bus service into Ifield and Ifield West is fairly frequent and well used. But the frequency of buses drops off in the evenings meaning that the bus becomes a less viable option. And all buses get involved in the congestion as there are no Fastway options. The bus service options would need to extend into any West of Ifield development with potential negative impacts on existing services in terms of frequency and journey length for Ifield, and other Crawley, residents.

The draft Horsham Local Plan does not have any specific bus related proposals. It is therefore, not clear that any additional provision would be provided for any potential development of Strategic Policy HA2: Land West of Ifield.

#### **3.4 Stations / Trains**

**Reference [HDC draft Local Plan] Strategic Policy 24: Sustainable Transport P88**

**Reference [HDC draft Local Plan] Strategic Policy HA2: Land West of Ifield P140**

Ifield rail station is very small and has no parking and very little bicycle parking. There is also very little space for extending this without compulsory purchase of adjacent land. Peak time drop-off can take place at school-run time with particular problems already existing at Mill school. And increased usage, however welcome, will surely worsen this situation.

There are current difficulties in terms of providing sufficient stations along the line from Three Bridges to Horsham. Kilnwood Vale master plan includes a station and there is now a possibility for a station in the Horsham Town Centre North development. The Arun Valley line is 2-track with potential new stations under discussion at Kilnwood Vale and North Horsham. Efforts by Crawley Borough Council to promote the delivery of Kilnwood Vale station have been obstructed. Kilnwood Vale would have ample space for car parking and would therefore relieve pressure on Ifield. But if this happened Ifield station may close. So, there is a question as to how many stations are to be in place along this section of the Arun valley line and where will they be located? This may have a significant effect on residents' options at the existing developments as well as any new development(s) West of Ifield.

#### **Ifield Station**

There is no space to install a decent number of racks at ifield station. These would be needed on the Ifield and the Gossops Green sides of the railway line.

Routes to and from Ifield station will need to be created and/or improved for both walkers, cyclists and bus users. It will be necessary to identify main 'trip attractors' related to the proposed development e.g., Gatwick, Manor Royal, Crawley Town centre, K2 etc, etc.

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There is currently no all-day parking except on the street. And there are very limited numbers of available on-street parking usage of which causes problems for current residents. And there is no space in which to create parking.

There is currently no parking for school drop-offs and pick-ups, at Ifield Mill school, and this will get worse as number of pupils increases.

Station Safety – the current platform is too short for the 12 car Thameslink trains, causing bunching of passengers on platforms waiting to board at rush hour, Combined with the extremely narrow platform widths, any increase in passenger numbers at peak times would be dangerous. Apparently there is no space to increase width or length. See section 3.3 of Alan Bailes Ltd report.

### **Train Capacity**

- Timetabled trains already filled to capacity in rush hour. Network Rail, rail operators [and possibly Highways Authority WSCC] have stated that additional capacity not possible – more frequent trains not possible on 2-track lines as can't be time-tabled around the fast services (fast between Horsham and Crawley).
- No capacity - space wise - to add additional lines - residential, businesses, bridge under Overdene drive
- What is the additional impact of Kilwood Vale and North Horsham developments and do existing figures take the WOI site into account
- What is HE assuming around this? No mention of rail capacity so far.

When questioned at consultations Homes England have replied that 'Stations' are an issue for Network Rail.

HDC draft Local Plan does not include any specific information related to Ifield station (probably because it is in Crawley) but neither does it explain how people in site HA2: Land West of Ifield would access train services. This is a major omission and questions the viability of the site being an 'Active Travel' neighbourhood leaving the only conclusion being that residents on the site would adopt car transportation with all the consequent increase in car travel, pollution, congestion, lack of parking etc, etc.

### **3.5 Cars**

**Reference [HDC draft Local Plan] Strategic Policy 24: Sustainable Transport P88**

**Reference [HDC draft Local Plan] Strategic Policy HA2: Land West of Ifield P140**

Despite the aspirations set-out in this policy i.e. 'e) All opportunities have been explored to maximise access to passenger rail services, primarily by walking, cycling and bus, but if appropriate by private car including the enhancement of rail station car parking where feasible; ' there will be cars. Lots of cars. A 3,000 house scheme could generate an additional 4,500 cars at 1.5 cars per house, or more. And a 10,000 house scheme would produce an additional 15,000 cars. And they will need to recognise their position in the hierarchy of needs. i.e., Pedestrian, cyclists, buses, cars, trucks.

What effect will the cars have on congestion, pollution, parking at destinations (e.g., Manor Royal has no spare capacity for parking and currently is looking for ways to alleviate problems that already exist).

It is not clear whether Homes England have considered car pools as an option. If they haven't, they should review this as car pools can complement Active-travel life styles well in terms of making a car available to people that usually bus, walk or cycle on the occasion that they need one.

### **3.6 Parking**

**Reference [HDC draft Local Plan] Policy 25: Parking P91**

There are chronic parking issues across most of Ifield and Ifield West and, in fact, in many Crawley neighbourhoods especially in the west of Crawley. Overspill parking often takes place, especially for people

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accessing Manor Royal and Gatwick airport. Additional population/activity in the area will exacerbate these problems.

There are also chronic shortage of parking problems in Manor Royal where many businesses raise this as the number one issue preventing them from expanding or growing their business. Various attempts to remedy this, working in conjunction with the Manor Royal Business District and West Sussex County Council have been unsuccessful due to the majority dependence on the private motor car. Homes England's West of Ifield proposals run the risk of making this problem worse, if their Active Travel ambitions are not met in reality, which seems to be more likely than not.

### **3.7 Congestion**

#### **Reference [HDC draft Local Plan] P14 3.2**

The Horsham draft Local Plan acknowledges 'ongoing congestion issues'. This congestion extends into Crawley's road network which is already operating over capacity along the A264/A23 corridor at rush hours as evidenced by daily queuing along that A264 and A23 for significant lengths of road. Options for alternative travel are poor or non-existent. Buses get caught up in the overall congestion and do not offer a particularly attractive alternative. School runs cause peak-time congestion around all schools in Ifield (Manor Green, Lady Margaret, Mill school). Much of this congestion is linked to traffic movements generated in the Horsham area, and, certainly, traffic emanating from site HA2: Land West of Ifield would predominantly use roads in Crawley as it has only internal roads identified in the Homes England plans with the only connection being onto Ifield Avenue adjacent to Crawley's boundary.

It is acknowledged that there is recognition that the congestion on the roads in and around Crawley is currently a significant issue that would be exacerbated by the current proposals. The development scenarios set out in the draft plan have been considered in the Horsham Transport Study - Local Plan Preferred Scenario Transport Assessment (TA).

The TA identifies that there are a number of junctions within Crawley that are shown to increase in congestion due to the West of Ifield site due to substantial flow increases. Several junctions within Crawley have been identified as being over capacity and requiring further mitigation even after the introduction of sustainable transport measures and signal optimisation – these junctions remain over capacity. The WSCC transport plan does not include either the funding source or the timeline (dates) for delivery of these improvements. This would need to be remedied before any West of Ifield site could be brought forward.

The West Sussex Transport plan was adopted on 1st April 2022 - [West Sussex Transport Plan - West Sussex County Council](https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan/) (<https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan/>) See Crawley pages 67 – 71 for details.

There is no evidence in the Horsham draft Local Plan that this issue is even recognised let alone policies to see achievable capabilities to support any extra traffic generated by Site HA2: Land West of Ifield.

### **3.8 Pollution**

#### **Reference [HDC draft Local Plan] Strategic Policy 12: Air Quality P59**

Congestion inevitably causes pollution. There are already two Air Quality Management Areas in Crawley (both in the East of Crawley) and it is likely that the regular queues into/from Manor Royal along the A23 could be over minimum levels. West of Ifield developments will only result in increases in traffic and therefore pollution. There is no reference to the pollution that West of Ifield development would create in Crawley.

The Horsham draft Local Plan does not include any proposals to control potential increases in Air Pollution that would be generated by the Site HA2: Land West of Ifield.

Section 6 of HDC's Strategic Policy 11: Environmental Protection states "Minimise air pollution and greenhouse gas emissions in order to protect human health and the natural environment" and section 7 "Contribute to the implementation of local Air Quality Action Plans and do not conflict with their objectives." The Strategic allocation HA2 is likely to conflict with these elements because of the traffic it is likely to generate between the

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allocation and Crawley, in particular where the development will contribute to services and facilities required for Crawley residents.

Similarly HDC's Strategic Policy 12: Air Quality states that for development of strategic allocations such as HA2 to accord with this policy highway infrastructure improvements are required. "Minimise traffic generation and congestion through access to sustainable transport modes, maximising the provision for cycling and pedestrian facilities;" Because of the scale of the allocation, access, provision and facilities are required outside of the allocation site and specifically within Crawley, existing connections are poor with narrow roads such as Rusper Road, Ifield Green and Ifield Wood, additionally one of the wider highway routes between Crawley and the allocation would be Ifield Avenue, but even this road only has a footpath on one side. With the increased traffic of up to 3000 new houses, it is hard to imagine occupiers will be encouraged to cycle or walk on any of these roads.

#### **3.9 Active Travel : 15/20-minute neighbourhood**

##### **Reference [HDC draft Local Plan] P18 3.20,**

Homes England are talking of 'Active Travel' and refer to '15 minute' neighbourhoods in their proposals. (Note: often 'Active Travel' neighbourhoods would be '20 minute' neighbourhoods.)

The Homes England proposals for significant levels of active travel are exemplary and ambitious but there is no evidence that these will actually work and it is more likely that occupants of the new developments will resort to car usage as per normal. Even if there is exemplary cycling and walking infrastructure across the whole West of Ifield development it will not be used as its interfaces with the existing active travel infrastructure will be poor – Ifield has little or no cycling infrastructure and what is there is poor and does not even include connections to Manor Royal and/or Crawley Town centre etc.

In fact, the access onto Rusper Road from the site is particularly hazardous. Rusper Road is narrow, with properties on both sides and little scope for widening the road, pavements or creating cycle lanes. Pavements are very narrow, and pedestrians already report feeling unsafe when buses and lorries use the road. There is no scope for safe cycling on the Rusper Road particularly during peak times, which is a particular concern given schoolchildren might be encouraged to cycle to the site from other parts of Ifield or Crawley.

Section 1a) to 1d) of HDC's Strategic Policy 24: Sustainable Transport relates to connectivity and sustainable transport. One of the key issues with the allocation is how inaccessible the allocation is in relation to the main urban area of Crawley. Section 1e)" All opportunities have been explored to maximise access to passenger rail services, primarily by walking, cycling and bus, but if appropriate by private car including the enhancement of rail station car parking where feasible" is particularly ineffective and will not address the concerns with HA2.

Section 1f) is similarly ineffective because it only requires innovative approaches to sustainable development to be "considered" so developers could explain why approaches were considered but discounted.

The Plan is adequate and contradictory in that it focuses on new residents of West of Ifield needing to travel out of the development, but fails to consider people travelling into the development to attend schools and other facilities. In addition to new housing, other development is proposed: a community, employment and transport hub to include a library, community centre, and potentially café and/or public house and indoor sports facilities, 3,300 sqm of retail space, 2.0 ha of employment floorspace to incorporate an enterprise and innovation centre, two 2-form entry primary schools, an 8-form entry secondary school, to incorporate support centres for special educational needs (SEND) and meet existing education needs in Crawley; two new full-day care nurseries, an education, skills and innovation facility, and the appropriate provision of land, buildings and/or financial contributions for NHS provision. All of these facilities could easily lead to further increased traffic on the roads around the site.

The plan for secondary and primary schools on the site, and the argument that they are needed to satisfy Crawley's 'desperate need' also needs to be assessed in the context of increased traffic flow, and possible effects on Crawley's AQMA. In a sense, due to their location, the schools would be too remote to serve any of Crawley's education needs, including those as a result of new housing development which has predominantly taken place in the North East of Crawley, some distance from West of Ifield with few options for using public transport. As a consequence, these new schools would encourage travel between Crawley and West of Ifield which is likely to be significant at certain times of the day. The result would mean that any Air Quality Impact

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Assessment and comprehensive Air Quality Strategy as part of a proposal would likely to conclude that such an impact could not be mitigated for. The very limited proposed travel improvements proposed in HA2 are also unlikely to mitigate the level of additional traffic these facilities could generate and, in particular, for the first 1600 houses there would be no road improvements at all.

### **3.10 Walking**

#### **Reference [HDC draft Local Plan] P79 Strategic Policy 19 – Development Quality**

The Horsham draft Local Plan has some general policies but lack specificity that would be needed in the Land West of Ifield site. For walking to be a viable option for people accessing Ifield Station or facilities in Crawley the walking routes must be direct and must be safe. The development would need good quality Street lighting and designs to recognise safety issues e.g., remoteness, protection for vulnerable users. And recognition needs to be made of the likely distances which would suggest that walking will not be a high use mode of transport in terms of connectivity with Ifield and Crawley facilities. It is unlikely that most, if any, of the site would be within 15 minutes walk of Ifield Station. There are few specific policies to address any of these needs leading to the conclusion that people will not walk in any great number and will mostly revert to car transportation.

### **3.11 Cycling**

#### **Reference [HDC draft Local Plan] P90 Strategic Policy 24 - Sustainable Transport**

Plans require clear proof of a 15/20-minute neighbourhood, via safe routes from end to end, compliant with Gear-Change and LTN 1/20. Cycle paths must be attractive, or people won't use them - people won't cycle if they do not feel safe.

All routes must be 'end-to-end' i.e., start at users' origin and end at their destination. Destinations might include Ifield station, Ifield parade, Crawley town centre, Manor Royal, K2, The Hawth, the Hospital, Three Bridges station etc, etc.

Efficient junctions are critical where walkers/cyclist do not have to wait long to cross and have safe (often traffic light) crossings.

Proposed Paths as indicated on Homes England draft designs, will come out onto Rusper Road and Ifield Drive, and then what? Walking and cycling routes need to be safe. Both of these roads will require fully compliant segregated walking and cycling paths, on both sides of the roads, to Ifield Station and Ifield Parade, at least, as well as the bike path from Ifield Station to Quantock Close in West Green (for access to Crawley Town centre, the hospital etc). It is likely the paths will need to access Ifield schools e.g. St Margaret's, Mill school and Manor Green SEN schools.

In practice, for significant numbers of the residents of West of Ifield to use cycling as a mode of transport, it will be necessary to have fully compliant routes to key locations including the Town Centre, Three Bridges station, Manor Royal and Gatwick Airport. No such routes exist at present although there are some, usually sub-standard, partial routes along some sections. Evidence needs to be provided that the required upgrades, improvements and new routes will be put in place. And that the funding is available to deliver these route upgrades in a timely manner.

Effective parking for cyclists at their destinations will need to be provided. This will probably fall to other organisations e.g., employers, Town Centre, County Oak operators etc, but is a necessary element for encouraging active travel/cycling.

Rusper road is dangerous, due to speeding and bends, and too narrow to add cycle paths – putting cyclists and motorists at risk.

Current plans appear to suggest a cycle path through Ifield Brook Meadows – if this is the case is it permitted across the area which is designated 'Local Green Space' and what will happen to the paths on Rusper Road at

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the connection which has no cycle facilities at present and existing high volumes of vehicle usage many of which do not observe the speed limits.

Other local roads (Ifield Drive, Warren Drive Tangmere Road, Ifield Avenue) are also very busy in rush hours and it is questionable as to whether cycle paths could be added due to space considerations.

The Homes England proposals should include a bike-share/hire scheme. Maybe also a bike purchase scheme.

There is insufficient space to put in a decent number of bike racks at ifield station. Any racks need to be covered racks for weather protection.

Who will pay for the improvements in cycling infrastructure elements across Crawley that will be needed to make the Active Travel cycling model workable? Note that Crawley has an up-to-date LCWIP that clarifies the details of infrastructure improvements that are needed.

Transport modelling seems to have been done on out of date parameters for typical cycle journey length. The growth of **e-bikes** has been phenomenal and, of course, the ability for anyone to travel quite long distances on an e-bike now is commonplace. So, a resident of West of Ifield could quite reasonably commute to/from Three Bridges station, for example, irrespective of their fitness levels. This opens up Active Travel to many more people – provided that the infrastructure is there. The current cycle infrastructure in Crawley is often sub-standard or non-existent e.g. cycle route into Three Bridges station from the West.

All of these reasons suggest that it is very unlikely that many people will use cycling as a form of transport to/from any West of Ifield development with the inevitable consequence that most people will use car transportation, or bus. This situation is not reflected in the assumptions used in the transport models raising serious questions about their accuracy and usefulness in terms of assessing policy and overall viability of the site. The obvious conclusion is that the site would generate significant extra journeys on Crawley's roads generated by 3,000 – 4,200 extra cars.

### **3.12 Other**

**Reference [HDC draft Local Plan] None,**

Active travel marketing

New residents will need to 'buy-in' to active travel. They will need support, especially initially, and inducements. They will also need to be persuaded that it is better to select an active travel mode. Some of the elements needed include:

1. Marketing – materials, promotions etc
2. Inducements – free bus pass for a period of time, subsidised bike purchase/hire

Transport apps – route guides for all modes of transport, bus/train schedules, timings e.g., how long to go from a to b by a particular mode etc

### **3.13 Legacy infrastructure**

**Reference [HDC draft Local Plan] None,**

Additional population to the West of Ifield will inevitably result in increased usage of legacy infrastructure especially roads and parking. The level of maintenance of the road network is poor in many places and increased traffic will worsen this situation. Parking capacity in most neighbourhoods is poor and, although the Town Centre currently has sufficient parking significant increases will result in problems for the existing population, for businesses and for the new residents. What investments or funding will Homes England bring to Crawley to help address this situation?

## **4. The impact of developing the site**

**Reference [HDC draft Local Plan]**

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The main transport questions relate to timing of transport infrastructure and the feasibility of the 15/20-minute neighbourhood. The surrounding transport infrastructure along the Horsham/Crawley/Gatwick corridor is already frail in that it is operating at an over-capacity level much of the time and each additional increment in the loadings exacerbate the existing problems making the existing populations transport problems worse. The additional vagaries of bus ticket pricing, where no buses in Crawley benefit from any subsidy, would raise significant questions about the ability to realistically achieve high levels of bus usage, especially when profit making bus services tend to reduce if profits are not forthcoming forcing most travellers into cars.

In the interim, and maybe indefinitely, it seems clear that any development will force people into cars and onto existing roads, of all capacities and whether main roads or 'rat-runs', adding to the existing congestion, pollution and parking problems. There is little evidence that Homes England have fully thought through how to deliver a successful '15-minute' neighbourhood in their rush to deliver large quantities of Houses.

### **5. Conclusion**

As outlined in this document there are many problems with Transport related elements of the Homes England proposals, whether for 3,000 or 10,000 houses, and the Horsham draft Local Plan does not address these issues satisfactorily or at all. There is very little confidence that the issues for the existing population have been understood, let alone resolved in the designs/proposals. Confidence in the ability of the developers to deliver infrastructure improvements in a timely way, to a quality and quantity needed, and as a comprehensive solution is very low based on previous experience e.g. Kilnwood Vale and the inability of West Sussex Highways to deliver either successful and comprehensive walking, bus and cycle routes across the area to a sufficient standard to attract large numbers of people out of their cars. These matters are sufficiently important and major to make the whole Homes England proposals unviable on their own.

**The issues raised above make the Horsham draft Local Plan unsound in terms of transport provision that would be needed by their HA2: Land West of Ifield site proposals.**

### **REFERENCES**

20-minute neighbourhood

<https://www.tcpa.org.uk/guide-the-20-minute-neighbourhood>

Sustrans '20 minute neighbourhood':

[What is a 20-minute neighbourhood? - Sustrans.org.uk](https://www.sustrans.org.uk/our-blog/get-active/2020/in-your-community/what-is-a-20-minute-neighbourhood)

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