



# Horsham / National Highways Statement of Common Ground

## Horsham District Local Plan 2023-2040

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### Signatories:

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**Dated:** 25 June 2024

### Statement

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#### 1. Introduction and Scope

- 1.1 This Statement of Common Ground (SCG) has been prepared by Horsham District Council (HDC) together with support from National Highways (NH).
- 1.2 HDC is the local planning authority for the area and has the main responsibility for coordinating development and change within the District. NH is the responsible authority for the strategic road network (SRN).
- 1.3 The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. The National Planning Policy Framework (NPPF) (paragraph 104b) states that planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.
- 1.4 In relation to plan making, DfT Circular 01/2022<sup>1</sup> is the policy of the Secretary of State in relation to the SRN which should be read in conjunction with the NPPF, other nationally prescribed policies and Planning Practice Guidance. Paragraphs 25 to 30 of the circular set out how National Highways will engage with the plan-making process. It states that relevant authorities are expected to engage with NH from the outset of plan-making, to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN. It also states that in exercising its function as a statutory consultee in the planning system, NH must co-operate as far

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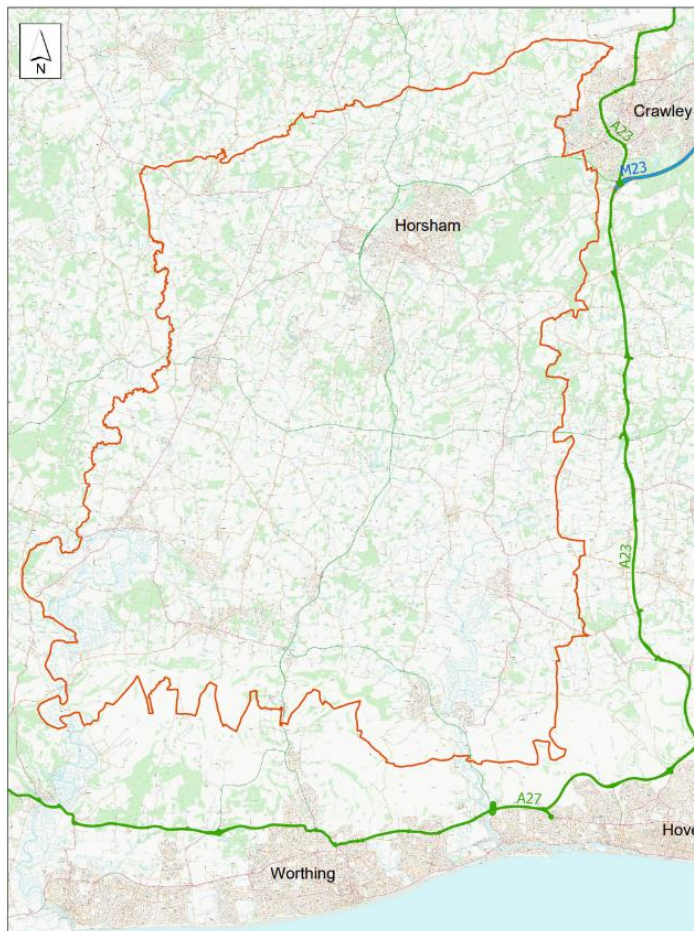
<sup>1</sup> Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development (Dec 2022)

as reasonably practicable with other parties. Consequently, it is obliged to provide appropriate, timely and substantive responses in the plan-making process.

- 1.5 The purpose of this SoCG is to set out the basis on which HDC and NH have actively and positively agreed to work together to meet the requirements of the Duty to Cooperate and achieve good alignment of their respective spatial and operational planning objectives. Relevant frameworks that are informing this joint working include 'The Strategic Road Network: Planning for the Future' (National Highways, Sep 2015) and 'National Highways: Licence' (Department for Transport, April 2015).
- 1.6 The NPPF defines the topics considered to be strategic matters (paragraph 20). One of these is 'infrastructure for transport'. The only strategic matter relevant to joint working between HDC and NH is the movement of vehicular traffic on the Strategic Road Network (SRN).

## **2. Horsham context**

- 2.1 Horsham District covers an area of 530km<sup>2</sup> (205 square miles) and is predominantly rural in character, containing a number of smaller villages and towns. The largest urban area is the market town of Horsham, situated in the north-east of the District. Key drivers of economic activity in the area are Gatwick Airport (to the northeast) and Brighton and Hove (to the southeast). The majority of the District lies within the Gatwick Diamond Economic Area.
- 2.2 The SRN in the vicinity of Horsham District comprises the M23/A23 London to Brighton corridor and the A27 coastal corridor. While neither corridor passes through the district itself, future growth and development within the district may impact upon them. Major intersections include the M23/A264 (J10 Copthorne), A23/A272 (Bolney), A27/A24 at Worthing and the A27/A283 Shoreham Interchange.



### 3. Positions of the parties

- 3.1 Horsham District Council has outlined that the District is under very significant development pressure. Government policy places much emphasis on housing delivery as a means of economic growth and addressing the national shortage of housing. The Standard Housing Methodology (SHM) as referred to in NPPF paragraph 61 (with details set out in Planning Practice Guidance) is the starting point for housing need in the District. The need for Horsham District is at least 917 dwellings per annum. In addition, NPPF paragraph 11b is clear that for plan-making, a local plan should provide for any needs that cannot be met within neighbouring areas, unless specific excepting circumstances can be demonstrated. A number of authorities have written to Horsham District to indicate that they have unmet housing needs, however due to identified significant impacts on the Arun Valley sites of international conservation importance constraining the supply of new homes over the new Local Plan period, Horsham District is currently unable to meet its own housing need and is therefore also unable to meet the needs of other areas at the current time.
- 3.2 Government equally places emphasis on building a strong, responsive and competitive economy, including by ensuring that sufficient land is available to support growth, innovation and improved productivity. This includes setting criteria, or identifying strategic sites, for local and inward investment to match the economic strategy and to meet anticipated needs over the plan period.
- 3.3 As a consequence, and to demonstrate positive planning for development and change, HDC proposes policies that will yield the following housing and employment supply from 2023 to 2040 as set out in Strategic Policies 37 and 29 respectively:

**Figure 1: Horsham District Local Plan 2023-2040 proposed housing supply**

<b>Source of housing supply</b>	<b>Number of homes</b>
Homes that are already permitted or have been allocated in a “made” Neighbourhood Plan, including previously allocated strategic sites	6,692
New Strategic Sites	2,985
Smaller scale allocations to be allocated in this Local Plan or in Neighbourhood Plans	1,795
Intensification of the Land North of Horsham strategic allocation in the Horsham District Planning Framework, 2015	60
Windfall housing supply	1,680
<b>Total Horsham District Local Plan period</b>	<b>13,212</b>
<b>Annual housing target (averaged over the Plan period)</b>	<b>777</b>

**Figure 2: Horsham District Local Plan 2023-2040 proposed employment supply (strategic scale sites)**

<b>Source of employment supply</b>	<b>Employment space</b>
Commitments - current planning permissions and sites under construction (strategic scale sites)	139,242 sqm
Strategic site allocations	6.5 ha.
Other site allocations	10.5 ha.

Note: data sourced from HDLP (Regulation 19) Table 5. Additional small site commitments are regularly monitored, see Authority Monitoring Report for details.

3.4 The position of National Highways, reflecting DfT Circular 01/2022, is that development should not have unacceptable impacts on the safety, reliability and operation of the Strategic Road Network. National Highways also expects that initiatives will be put forward that manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites. This is particularly necessary where the potential impact is on sections of the strategic road network that could experience capacity problems in the short or medium term. Therefore, as necessary and appropriate, any development must be accompanied by suitable mitigation in the right places at the right time, that is to the required standards and is deliverable in terms of land availability, constructability and funding. For avoidance of doubt, a local plan and associated Infrastructure Delivery Plan (IDP) need only mitigate the impacts specifically arising from the local plan, and proportionately mitigate any cumulative cross-border impacts in a manner which is compatible with the requirements of the other relevant local authorities.

#### 4. Key points of agreement

##### ***HDLP policies and strategy***

- 4.1 In accordance with the above positions, the parties support Circular 01/2022 paragraph 12 which strongly advocates development at locations that are or can be made sustainable, support sustainable transport modes and support business sectors as well as supporting new growth. The parties note that under plan-making transitional arrangements, the relevant version of the NPPF against which to consider the Horsham District Local Plan (HDLP) was published in September 2023 (this pre-dates the latest December 2023 version). The NPPF promotes sustainable patterns of development and the role planning has in promoting sustainable travel. The parties note in particular NPPF (Sep 2023) Section 9 paragraphs 104-106 in respect of impacts and opportunities arising from development, active management of patterns of growth, and the role of place-making, including mix of uses, in achieving these objectives.
- 4.2 Without prejudice to matters relating to specific impacts of development sites on the SRN, the parties agree that the overall spatial strategy of allocating development sites to reflect the settlement hierarchy is an appropriate strategy for reducing the need to travel, minimising journey lengths and minimising journeys made by private car. This element of the spatial strategy is summarised in paragraph 4.13 of the HDLP which states: *“This strategy therefore seeks to continue to support development that takes place in and adjoining the most sustainable villages and towns of our District, including through the re-use of previously developed land (brownfield land), and ensuring that the development makes efficient use of land.”*
- 4.3 The parties also agree that the HDLP appropriately seeks to reduce demand on the SRN by promoting more sustainable forms of transport. This is reflected throughout the HDLP and in particular in Strategic Policy HA1: Strategic Site Development Principles which states in part 10 that strategic development will *“be designed to minimise the need to travel in the first instance and prioritise pedestrian and cycling opportunities. Development shall have a legible layout that facilitates other modes of sustainable transport and minimises reliance on the private car.”* It is also agreed that Policy 24: Sustainable Transport supports the wider spatial strategy, which seeks to establish patterns of strategic development that improves opportunities for home working, local journeys within neighbourhoods, walking, cycling and the use of public transport.
- 4.4 A checklist indicating HDLP compliance with Circular 01/2022 has been prepared by the Council and reviewed by NH. This is shown in Appendix 1 to this SoCG. It is agreed that Appendix 1 demonstrates that the HDLP and the evidence supporting it appropriately respond to Circular 01/2022, subject to the further matters addressed in this SoCG.
- 4.5 It is nevertheless acknowledged that the HDLP policies are ‘high-level’ in nature and the extent to which increased walking, cycling and public transport use is achieved is not fully known at this stage. It is agreed that the base assumptions in modelling the impacts of development in the Local Plan are compliant with the requirements of Circular 01/2022 and reflect the expected impacts of typical examples of the proposed measures, to ensure the future effectiveness of physical mitigation measures.

##### ***Technical evidence***

- 4.6 The main evidence underpinning the HDLP in respect of impact on the road network, including the SRN, is the Horsham Transport Study. This incorporates a purpose-built model (the 'Model') which has enabled an objective high-level assessment of the impacts of development going forward in a study area focused on Horsham District. The full final suite of study reports have taken into account relevant representations made at the Regulation 19 stage, and is published in full on the Council's website. The study materials demonstrate there are no SRN-related 'showstoppers' to the delivery of the HDLP development strategy.
- 4.7 The parties agree that the elements of the Study listed in Figure 3 have been undertaken robustly and are an appropriate basis for testing strategically the highway impacts of the HDLP and informing mitigation measures. It is acknowledged that other documents have been published as part of the Study: these are summarised or signposted in the main Horsham Transport Study Local Plan 2039 Transport Assessment and are also agreed.

**Figure 3: Agreed evidence base as published at Regulation 19 stage**

<b>Document Title</b>	<b>Date published</b>
Appendix B - Horsham Highway Model Local Model Validation Report	Nov 2019
Technical Note 03 – Model Forecasting Methodology - Overview (subsequently incorporated into Appendix C)	Dec 2019
Appendix C - Horsham Highway Model Forecast Report	Jan 2020
Horsham Transport Study Local Plan 2039 Transport Assessment	Dec 2022
Horsham District Local Plan Transport Study - Local Plan Transport Assessment Autumn 2023 Review	Nov 2023
Horsham Local Plan Highway Safety Study	Apr 2024
Technical Note TN001: Responses to Pre-Regulation 19 Consultation Queries	Apr 2024

***Impacts on the SRN and mitigation***

- 4.8 The signatories agree, based on appropriate modelling and analysis reported in the Horsham Transport Study reports, that three SRN locations are potentially impacted by the HDLP together with general traffic growth such that further investigation was warranted.

4.9 NH has made a representation at the Regulation 19 stage which firstly notes that a number of technical discussions with HDC officers have taken place, and comments made on a number of draft supporting documents. The representations identified a number of actions to be ideally undertaken either prior to the Regulation 19 consultation, or else in advance of the formal submission of the Plan, in relation to these junctions.

4.10 HDC has duly commissioned their transport consultants to prepare further analysis and information, including consideration of any additional mitigation measures. **Technical Note TN001: Responses to Pre-Regulation 19 Consultation Queries** has been presented to National Highways and is published. The signatories agree that this provides a suitable evidence base. Specific mitigation measures such as traffic light signal optimisation will be included in the Infrastructure Delivery Plan (IDP). The parties agree that the measures in the Horsham Transport Study Pre-Submission Technical Note (and reflected in the IDP) are appropriate and proportionate. The outcome of this further analysis is reported in Technical Note TN001: Responses to Pre-Regulation 19 Consultation Queries. Figure 4 provides a summary:

**Figure 4: Summary of TN001 for the key junctions**

(paragraph references from Technical Note TN001 in brackets)

<p>M23 Junction 11 (Pease Pottage)</p>	<p>The impact of the Local Plan does not trigger the need for mitigation resulting from the additional Local Plan traffic. It is concluded that a revised Layout E would potentially be needed in future as a result of background growth and is not as a result of the LP development. (TN001, 2.10)</p> <p>The V/C, queue and delay outputs do not indicate any significant issues as a result of the additional Local Plan traffic. (TN001, 2.16)</p> <p>Flow change diagrams at the Pease Pottage and A23/Bolney Road junctions and A23 Hickstead junctions have been provided in Figures 3 to 8. (TN001, 2.20)</p> <p>It is considered that results from [sensitivity testing using] the strategic model are sufficiently robust and proportionate approach to inform the impacts of the LP and in particular that, with the LP, the [Pease Pottage] junction is still operating below capacity when the [traffic light] signals are optimised. (TN001, 2.22)</p>
<p>A23 Bolney junction</p>	<p>The V/C, queue and delay outputs do not indicate any significant issues as a result of the additional Local Plan traffic. (TN001, 2.16)</p>

	Flow change diagrams at the Pease Pottage and A23/Bolney Road junctions and A23 Hickstead junctions have been provided... in Figures 3 to 8. (TN001, 2.20)
A23 Hickstead junction	The [sensitivity test] modelling [to include the Goddards Green Science and Technology Park junction mitigation schemes] shows that any flow changes resulting from the sensitivity test are insignificant and therefore the results reported within the TA are still applicable... A comparison of flows between the LP sensitivity test and the LP reported within the TA are shown in Figure 9 to Figure 14 which demonstrates the insignificant difference in the results. (TN001, 2.26)

## 5. Agreed next steps

- 5.1 The parties agree to effectively engage going forward to Regulation 22 Submission stage, with an objective of confirming the final SRN mitigation strategy to support and underpin the HDLP which is in effect evidenced by this SoCG. The parties also agree that the costed measures included in the mitigation strategy will be included in the Infrastructure Delivery Plan supporting the HDLP.

## 6. Closing matters and further work

- 6.1 The signatories agree that they have worked jointly and constructively on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, through sustained joint dialogue, with respect to any outstanding matters.



## Appendix 1: Circular 01/2022 compliance checklist

### Horsham District Local Plan 2023-2040 (Regulation 19): Department for Transport Circular 01/2022 compliance checklist

This document sets out how particular paragraphs in the DfT Circular 1/22 have been complied with whilst preparing the Horsham District Local Plan 2023-2040 (HDLP) (see [www.horsham.gov.uk/localplanreg19](http://www.horsham.gov.uk/localplanreg19)). Only paragraphs relevant to plan-making are covered, which fall in the following sections of C1/22:

#### New connections and capacity enhancements

- Principles of sustainable development (paragraphs 11-13 and 15-17)
- New connections and capacity enhancements (paragraphs 23-24)

#### Engagement with plan-making

- General principles (26, 28-30)
- Evidence base (31-33)
- Infrastructure delivery (34)
- Integrations strategies (35, 36)

#### Engagement with decision-taking

- General principles (42-44, 46)

The HDLP is considered fully compliant with C1/22. The HDLP is focused on reducing the need to travel, as demonstrated by the HDLP Spatial Objective 5:

*“Brings forward well designed inclusive development that takes account of community feedback and is supported by the timely provision of necessary infrastructure (in advance of or concurrent with new development) that prioritises walking, cycling and public transport, provides accessible community services and open spaces that meet local and wider District requirements and contributes to healthy lifestyles.”*

The Council has undertaken regular duty to cooperate discussions with West Sussex County Council (as local highways authority) and National Highways. The Council’s evidence has demonstrated no major impact on the Strategic Roads Network. The HDLP’s in-combination impacts, whilst not a significant contributor, will be explored further with National Highways and other partners.

Ref (para in C1/22)	Plan-making requirements	Relevant LP text / evidence	Weblinks
11	The company's licence agreement defines sustainable development as encouraging economic growth while protecting the environment and improving safety and quality of life for current and future generations.	<p><b>Paragraph 2.3.</b> This paragraph highlights that achieving sustainable development is a core principle of the NPPF. This means balancing the need for economic growth with social and environmental requirements and ensuring that the ability of future generations to meet their needs is not compromised.</p> <p><b>Strategic Policy 1: Sustainable Development.</b> This is the model policy included to confirm compliance with NPPF. It includes the statement: <i>"It will always work pro-actively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area."</i></p> <p><b>Sustainability Appraisal (SA).</b> This has been produced in accordance with regulations transposed into UK law from European Directive 2001/42/EC. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development. The SA has fed into the Local Plan policies and site allocations.</p>	Sustainability Appraisal: <a href="https://www.horsham.gov.uk/_data/assets/pdf_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf">https://www.horsham.gov.uk/_data/assets/pdf_file/0006/132378/Sustainability-Appraisal-Dec-23.pdf</a>
12 & 13	(12) New development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. Developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be	<b>Strategic Policy 24: Sustainable Transport.</b> This policy seeks 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. For new development, it requires that the need to travel is minimised (with criteria given to achieve this), and that the	Infrastructure Delivery Plan: <a href="https://www.horsham.gov.uk/_data/assets/pdf_file/0011/131789/Reg-">https://www.horsham.gov.uk/_data/assets/pdf_file/0011/131789/Reg-</a>

	<p>a key consideration when planning for growth in all local authority areas.</p> <p>(13) As set out in the Transport Decarbonisation Plan, Gear Change, Bus Back Better and the second Cycling and Walking Investment Strategy, walking, wheeling, cycling and public transport must be the natural first choice for all who can take it. However, where developments are located, how they are designed and how well delivery and public transport services are integrated has a huge impact on people’s mode of travel for short journeys. The company will therefore expect strategic policy-making authorities and community groups responsible for preparing local and neighbourhood plans to only promote development at locations that are or can be made sustainable and where opportunities to maximise walking, wheeling, cycling, public transport and shared travel have been identified</p>	<p>development is designed to prioritise active travel, and that bus and rail travel opportunities are realised as fully as possible.</p> <p><b>Strategic Policy 23: Infrastructure Provision.</b> This policy seeks to ensure that either sufficient infrastructure capacity exists to meet the requirements of new development, or where additional capacity is needed, that it is provided in a timely manner.</p> <p><b>Strategic Policy 20: Development Principles</b></p> <p>Criterion 10 of this policy required that development 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.</p> <p><b>Strategic Policy 29: New Employment.</b> This provides sufficient land (and choice of sites) for new and expanded employment opportunities to respond to the District’s growing population, thereby minimising the need for commuting out of the District. It also supports home-based businesses and home working, which can reduce the need to travel.</p> <p><b>Strategic Policy HA1: Strategic Site Development Principles and the Strategic Site Allocations (Strategic Policies HA2, HA3 and HA4).</b> Policy HA1 sets out criteria on net zero and minimising car travel, mixed-use communities, necessary supporting infrastructure and transport mitigation, and requires prioritisation of pedestrian and cycling opportunities. The selection of the three strategic sites was greatly influenced by opportunities to travel sustainably to higher</p>	<p><a href="#">19-Draft-IDP-Dec-2023.pdf</a></p>
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		<p>order settlements, in line with the recommendations of the Sustainability Appraisal.</p> <p><b>Settlement Site Allocations (Policies HA5 to HA21).</b> The selection of non-strategic sites was guided by various criteria stemming from the principles of sustainable development. A key consideration was the settlement hierarchy and settlement sustainability. Almost all housing site allocations have therefore been located in or adjacent to settlements with some community infrastructure that can be reached by active travel means (e.g. primary school, shop, pub, bus stops).</p> <p><b>Infrastructure Delivery Plan (IDP).</b> This recognises the need for developer funded investment to ensure sustainable and effective functioning of movement networks and gives delivery timescales where appropriate. It draws on the Horsham Transport Strategy to identify these requirements. Some strategic improvements will be dependent on regional level funding or coordination of pooled funding across a wide area.</p>	
15	<p>The Transport Decarbonisation Plan and the Future of Freight Plan also recognise that local planning and highway authorities need help when planning for sustainable transport and developing innovative policies to reduce car dependency. This includes moving away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including 'vision and</p>	<p>As response on paras 12 &amp; 13 in respect of reducing car dependency, plus</p> <p><b>Horsham Transport Study (Dec 2023)</b> – The approach to mitigation is 'sustainable measures' first, and then focused major highways improvements to deal with the residual.</p> <p><b>Development Management</b> stages will generally deal with more detailed vision and design issues.</p>	<p>Horsham Transport Study Executive Summary:  <a href="https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf">https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf</a></p>

	<p>validate, 'decide and provide' or 'monitor and manage'). The company will support local authorities in achieving this aim through its engagement with their plan-making and decision-taking stages, while recognising the varying challenges that will be presented by certain sites based on their land use, scale and/or location.</p>		<p>The full Transport Study and Appendices are at:   <a href="https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base">https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base</a></p>
16	<p>In the context of achieving sustainable development, the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. The NPPF is clear that design quality should be considered throughout the evolution and assessment of development proposals. Plan-making and decision-taking should ensure that developments optimise the potential of sites to support local facilities and sustainable transport networks.</p>	<p>As response on paras 12 &amp; 13 in respect of reducing car dependency, plus</p> <p><b>Strategic Policy 19: Development Quality</b></p> <p>This policy requires development to deliver sustainable and beautiful buildings and places that enhance and protect locally distinctive characters through good design, landscaping (both within a scheme and in terms of the impact on surrounding landscapes), creating or contributing to the identity or 'sense of place', and in ensuring that local, social and environmental characteristics are considered. It references Council endorsed Design Codes and Guides, the Building for a Healthy Life design toolkit, the National Design Guide and the National Model Design Code, or any future updates (criterion 1).</p> <p>The policy also encourages and enables low traffic neighbourhoods with good street design that prioritises pedestrians and cyclists, promoting active travel modes which in turn improves people's health and wellbeing (criterion 2); and requires efficient use of land and optimum provision and use of buildings and open space within a site, taking into account the character, appearance and needs of the</p>	

		<p>site itself, together with the appearance and needs of the surrounding area (criterion 5).</p> <p><b>Strategic Policy 20: Development Principles</b></p> <p>This policy requires development to deliver beautiful and sustainable buildings and places. It requires that development makes efficient use of land, and prioritises the use of previously developed land and buildings, whilst respecting any constraints that exist (criterion 1); and that it is locally distinctive in character, respects and responds to the character of the surrounding area (including the overall setting, townscape features, views and green corridors) and, where available and applicable, takes account of the guidance in relevant Council endorsed Supplementary Planning Documents, Design Statements, Character Assessments and/or masterplans (criterion 5).</p>	
17 & 43	<p>(17) Successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries. The company will support development promoters and local authorities in applying the principles of Manual for Streets, the National Design Guide on Movement, inclusive mobility and local transport note 1/20 to ensure priority is given to pedestrian and cycle movements, and that well-considered parking, servicing and utilities infrastructure for all users is incorporated into development proposals.</p> <p>(43) The company expects development promoters to enable a reduction in the need to travel by</p>	<p>As response on paras 12 &amp; 13. Note in particular <b>Strategic Policy 24: Sustainable Transport</b> references the National Design Guide and the National Model Design code, and LTN 1/20 (criterion 2). Plus,</p> <p><b>Policy 25: Parking</b></p> <p>This policy sets out a balanced approach to parking provision seeking to reduce reliance on the private car as far as possible, whilst ensuring that sufficient car parking facilities are provided for new development and for all users. It also sets out the approach to cycle parking and provision of electric vehicle charging points. The policy / supporting text references West Sussex County Council's 'Guidance on Parking at New Developments' and Local Transport Note 1/20.</p>	<p>The 'Parking and Street Design Study Report' (SYSTRA, February 2023) can be provided to National Highways on request.</p>

	<p>private car and prioritise sustainable transport opportunities ahead of capacity enhancements and new connections on the SRN. For residential-led developments, due consideration should be given to home and street layouts, broadband infrastructure, safe and secure cycle parking, and access to local amenities and open space in support of these aims, while mobility or micromobility hubs should be provided in larger schemes. In addition, high-powered and open-access EV chargepoints should be installed where developments include on-street or communal parking to support the government's objective to end the sale of new conventional petrol and diesel cars/vans by 2030 and HGVs by 2040, and its commitment to decarbonise transport by 2050.</p>	<p><b>Development Management</b> stages will generally deal with more detailed vision and design issues.</p>	
23, 31	<p>(23) Capacity enhancements such as modifications to existing junctions or road widening to facilitate development should be determined on a case-by-case basis. The general principle should be accepted where proposals would include measures to improve community connectivity and public transport accessibility, and this will be weighed against any negative safety, traffic flow, environmental and deliverability considerations, impacts on the permeability and attractiveness of local walking, wheeling and cycling routes, and alternative options to manage down the traffic</p>	<p><b>Horsham Transport Study (Dec 2023)</b></p> <p>The Horsham Transport Study was undertaken to determine the impacts on traffic flows on Horsham's roads resulting from development to come forward from the new Horsham District Local Plan and propose mitigation measures. Chapter 4 of the Transport Study December 2022 explains that <i>"the primary focus is on reducing the need to travel in the first place, prioritising sustainable transport and ensuring the effective and efficient operation of the Horsham transport network"</i> (paragraph 4.1.3).</p> <p>The sustainable mitigation measures built into the modelling were as follows as applied to strategic sites:</p>	<p>Horsham Transport Study Executive Summary:  <a href="https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf">https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf</a></p> <p>The full Transport Study and Appendices are at:</p>

	<p>impact of planned development or improve the local road network as a first preference.</p> <p>(31) The NPPF expects local plans and spatial development strategies to be underpinned by a clear and transparent evidence base which informs the authority’s preferred approach to land use and strategic transport options, and the formulation of policies and allocations that will be subject to public consultation. The company will expect this process to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.</p>	<ul style="list-style-type: none"> <li>• 12% internalisation reduction factor (against TRICS) on strategic development (mixed use) sites;</li> <li>• Various improvements provided by strategic sites to encourage high mode shares for sustainable travel, e.g. bus frequency enhancements, on- and off-site cycle and pedestrian enhancements, and improved interchange e.g. at bus and rail stations;</li> <li>• Site-specific and route-specific additional car trip reductions to take account of expected site-specific mitigation strategies and varying levels of accessibility to nearby town centres using sustainable modes.</li> </ul> <p>Following initial modelling, a number of junctions were identified on the main road network as being over-capacity and suffering greater congestion as a result of the Local Plan. The study demonstrated that many of these impacts could be successfully mitigated through sustainable mitigation measures to further reduce car trips (for example, increased opportunity to work at home). Others could be mitigated through improving the phasing of signalised junctions (‘signal optimisation’).</p> <p>A few junctions on the major road network were, despite sustainability improvements, found to need capacity upgrades. Initial scheme designs have been prepared and costed. Bus priority has been considered as part of this.</p> <p>The full suite of documents forming part of the Horsham Transport Study has been made available for public scrutiny on publication of the Horsham District Local Plan 2023-2040 (Regulation 19).</p>	<p><a href="https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base">https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base</a></p>
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<p>24, 28, 29</p>	<p>(24) Where new connections and capacity enhancements to the SRN would be accepted, the relevant authorities and development promoters should fully consider this outlay with respect to the viability of development.</p> <p>(28) The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.</p> <p>(29) New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms</p>	<p>The <b>Horsham Transport Study</b> (Section 7) examines impacts on the Strategic Road Network (SRN). The <b>Transport Study Executive Summary</b> states: <i>"The assessment of impacts on the SRN... has indicated that the A23 is already over capacity within the Reference Case model, due to the amount of additional traffic being added from the south coast towns, travelling north towards the M25 and London, as well as growth from Mid Sussex and Crawley. This additional traffic is resultant from background growth of traffic not related to the Horsham Local Plan developments and therefore the majority of impacts arise due to increases in background growth from elsewhere."</i> (paragraph 1.7.8).</p> <p>The Executive Summary further states: <i>"It is therefore recommended that further discussion be held with National Highways to discuss what further means there are to quantify impacts that would specifically arise from Local Plan developments, which in practical terms will mean exploring options for mitigation in a future Road Improvement Strategy (RIS) or other multi-body delivery routes, likely to also include consideration of combined impacts from this Plan and the emerging Mid Sussex Local Plan."</i></p> <p>The Transport Study (paragraph 7.4.2) does identify one location where the Local Plan traffic appears to have a clearer impact, which is the southbound merge at M23 Junction 11 (Pease Pottage). The same paragraph states: <i>"Due to high levels of V/C [Volume/Capacity ratio] already within the Reference Case, no additional physical mitigation is currently proposed at the junction, however further discussion with National Highways would be beneficial in order to confirm this approach."</i> This is currently being explored through an emerging Statement of Common Ground (SoCG).</p>	<p>Horsham Transport Study Executive Summary:  <a href="https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf">https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf</a></p> <p>The full Transport Study and Appendices are at:  <a href="https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base">https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base</a></p> <p>Infrastructure Delivery Plan:  <a href="https://www.horsham.gov.uk/data/assets/pdf_file/0011/131789/Reg-19-Draft-IDP-Dec-2023.pdf">https://www.horsham.gov.uk/data/assets/pdf_file/0011/131789/Reg-19-Draft-IDP-Dec-2023.pdf</a></p>
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	<p>for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy.</p>	<p>Notwithstanding the above, the principle of contributions to any SRN improvements arising from cumulative cross-border development impacts is set out in:</p> <p><b>Strategic Policy 23: Infrastructure Provision</b></p> <p><b>Strategic Policy 24: Sustainable Transport</b></p> <p>The <b>Infrastructure Delivery Plan (IDP)</b>, updated in Dec 2023, is the strategy for delivering infrastructure supporting the Local Plan. It is a live document and any necessary infrastructure upgrades not already identified can, in future, be included in it.</p> <p>The <b>Local Plan Viability Assessment</b> includes an assumption for transport infrastructure contributions associated with strategic sites. Other sites are small to medium in scale therefore costs are captured through CIL or site-specific Section 106.</p>	<p>Horsham Local Plan Viability Assessment:</p> <p><a href="https://www.horsham.gov.uk/data/assets/pdf_file/0016/131605/Horsham-Local-Plan-Viability-Assessment-November-2023RS.pdf">https://www.horsham.gov.uk/data/assets/pdf_file/0016/131605/Horsham-Local-Plan-Viability-Assessment-November-2023RS.pdf</a></p>
26	<p>The NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and in development proposals so that sustainable transport can be promoted. In relation to the preparation of local plans and spatial development strategies, the government expects that the relevant authorities will engage with the company from the outset of this process, to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN. The involvement of the company will ensure that the strategic transport evidence base will provide a robust assessment of any positive and</p>	<p><b>Duty to Cooperate Statement</b> – there have been 8 meetings between HDC, WSCC and NH since Dec 2020. All information relevant to modelling methodologies and assessment of strategic impacts has been shared with NH and comments received from NH have been taken into account as evidence has been prepared.</p> <p>Direct liaison took place between NH and Stantec (formerly Peter Brett Associates) in 2021 regarding technical details of model validation and forecasting assumptions.</p> <p>Relevant evidence will be presented in the Duty to Cooperate Statement, and bilateral HDC/NH Statement of Common Ground (being prepared for Regulation 22 submission).</p>	<p>Draft Duty to Cooperate Statement:</p> <p><a href="https://www.horsham.gov.uk/data/assets/pdf_file/0016/132613/Duty-to-Cooperate-Statement.pdf">https://www.horsham.gov.uk/data/assets/pdf_file/0016/132613/Duty-to-Cooperate-Statement.pdf</a></p>

	negative impacts on the SRN and inform a transport strategy and the Strategic Environmental Assessment (SEA) for the study area that aligns with the safe operation and long-term integrity of the SRN.		
30	The NPPF is clear that planning policies should recognise the specific locational requirements of different economic sectors, including for storage and distribution operations at a variety of scales and in suitably accessible locations. To operate efficiently, the freight and logistics sector requires land for distribution and consolidation centres at multiple stages within supply chains including the need for welfare facilities for the drivers of commercial vehicles. For instance, some hubs serve regions and tend to be located out-of-town near the SRN, while others are 'last-mile' facilities that will support more sustainable freight alternatives in urban areas. The Future of Freight Plan sets out that a joined-up approach between the planning system, local authorities and industry can safeguard and prioritise the land needed for these uses, such that all parties should work together to identify the specific requirements in their area.	<p><b>Strategic Policy 29: New Employment</b></p> <p>This provides sufficient land (and choice of sites) for new and expanded employment opportunities to respond to the District's growing population, thereby minimising the need for commuting out of the District. It also supports home-based businesses and home working, which can reduce the need to travel. The policy specifies B8 uses as a potential employment generating use, and there is flexibility in the policy to allow for logistics related uses, subject to the role the site plays in the settlement hierarchy.</p> <p><b>Strategic Policy 30: Enhancing Existing Employment</b></p> <p>This policy seeks to protect employment and commercial sites which contribute to local employment opportunities that meet the needs of residents, whilst enabling sites that are no longer economically viable to be considered for other appropriate uses. A list of key employment sites is given in the policy, with B8 uses one of the classifications specified for these sites.</p>	Northern West Sussex Economic Growth Assessment – Focused Update for Horsham: <a href="https://www.horsham.gov.uk/_data/assets/pdf_file/0018/104247/Horsham-Focused-EGA-Update-FINAL-20.11.20.pdf">https://www.horsham.gov.uk/_data/assets/pdf_file/0018/104247/Horsham-Focused-EGA-Update-FINAL-20.11.20.pdf</a>
32	The Transport Decarbonisation Plan indicates that carbon emissions from car and van use is the largest component of the United Kingdom's total transport emissions. While action is being taken to	As response on paras 12 & 13 in respect of reducing car dependency, plus	

	<p>decarbonise transport such that all new cars and vans will be fully zero emission at the tailpipe from 2035, the proposed location of growth in current plan periods and whether new developments would be genuinely sustainable remain important factors in demonstrating that a local authority area is on a pathway to net zero by 2050 and therefore compliant with the requirements of the Climate Change Act 2008.</p>	<p><b>Strategic Policy 6: Climate Change</b></p> <p>This policy requires that new development is as a minimum designed to be net zero carbon in construction and operation. Criterion 1(e) supports using patterns of development and providing sustainable transport infrastructure which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport and other forms of sustainable transport and ensure residents have access to services and facilities that are within walking distance.</p>	
33	<p>Alongside this, the local authority should identify the key issues within their study area regarding transport provision and accessibility, setting out how the plan or strategy can address these key issues in consultation with the company. It is the responsibility of the local authority undertaking its strategic policy-making function to present a robust transport evidence base in support of its plan or strategy. The company can review measures that would help to avoid or significantly reduce the need for additional infrastructure on the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel. A robust evidence base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects</p>	<p><b>Horsham Transport Study (Dec 2023)</b> – the approach to mitigation is ‘sustainable measures’ first, and then focused major highways improvements to deal with the residual.</p> <p>The Transport Study engages a SATURN forecast model applied to the Local Plan ‘Preferred Scenario’ for the quantum and location of development. This has been modelled with assumptions built-in to reflect a spatial strategy and policies which factor in higher take-up of sustainable travel, with developments required to incorporate various measures to support this (see response above to 12,13; 23,31 and 24,28,29). Mitigation interventions to the network have been identified as necessary, and further modelling undertaken to test the reassignment impact.</p> <p>Some junctions were identified on the main road network as being over-capacity and suffering greater congestion as a result of the Local Plan. The study demonstrated that many of these impacts could be successfully mitigated through sustainable mitigation measures to further reduce car trips (for example, increased</p>	<p>Horsham Transport Study Executive Summary:  <a href="https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf">https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf</a></p> <p>The full Transport Study and Appendices are at:  <a href="https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base">https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base</a></p>

	of possible mitigation scenarios that shift demand into less carbon-intensive forms of travel.	opportunity to work at home). Others could be mitigated through improving the phasing of signalised junctions ('signal optimisation').	
34	The company's engagement with plan-making will help inform the preparation of the local authority infrastructure delivery evidence base. From a transport perspective, this evidence should provide a means of demonstrating to the examining inspector, development industry and local communities that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of infrastructure; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged.	<p>The <b>Infrastructure Delivery Plan (IDP)</b>, updated in Dec 2023, is a live document and includes necessary infrastructure upgrades and means of delivery. The key infrastructure providers have been consulted on the current and earlier iterations.</p> <p>There have been 8 meetings between HDC, WSCC and NH since Dec 2020. All information relevant to modelling methodologies and assessment of strategic impacts has been shared with NH and comments received from NH have been taken into account as evidence has been prepared.</p> <p><b>Local Plan Viability Assessment</b> includes an assumption for transport infrastructure contributions.</p>	<p>Infrastructure Delivery Plan:  <a href="https://www.horsham.gov.uk/_data/assets/pdf_file/0011/131789/Reg-19-Draft-IDP-Dec-2023.pdf">https://www.horsham.gov.uk/_data/assets/pdf_file/0011/131789/Reg-19-Draft-IDP-Dec-2023.pdf</a></p>
35	Local plans and spatial development strategies should seek to better integrate the SRN with the wider road network and other transport modes to enhance connectivity, maximise opportunities to facilitate economic growth and support transport decarbonisation across the country.	Not applicable. SRN sits outside of HDC boundary.	
36	In line with the aims of promoting sustainable development and the commitment in the Transport Decarbonisation Plan to deliver a world class cycling and walking network in England by 2040, planned improvements to the SRN must include the consideration or development of safe and	Not applicable. SRN sits outside of HDC boundary.	

	integrated networks for pedestrians, wheelers, cyclists and horse-riders.		
42	Local planning authorities and development promoters are encouraged to identify any potential impacts on the SRN that may result from development proposals and discuss them with the company at the earliest opportunity. In the first instance, new developments should give priority to walking, wheeling and cycle movements and facilitate access to high-quality public transport where possible. The needs of people with disabilities and reduced mobility should be appropriately addressed in relation to all modes of transport. This can be achieved through good design and proper consideration of the needs of our communities in accordance with local design codes and Manual for Streets.	<p>As response on paras 12 &amp; 13 in respect of priority given to walking, wheeling, cycling and public transport.</p> <p>As response on paras 24, 28 &amp; 29 in respect of identified impacts on the SRN - <b>Horsham Transport Strategy (Dec 2023)</b>.</p> <p>There have been 8 meetings between HDC, WSCC and NH since Dec 2020. All information relevant to modelling methodologies and assessment of strategic impacts has been shared with NH. In particular, a draft of the Horsham Transport Study was shared with NH in January 2021 (comments received back in February 2021), and a draft Statement of Common Ground shared in April 2021 (and comments received back the same month). There have been follow-up discussions on the SRN impacts and more recently, HDC has shared with and received comments from NH on the most up-to-date, published version of the Horsham Transport Study (December 2023).</p> <p><b>Development Management</b> stages will generally deal with more detailed design issues.</p>	<p>Horsham Transport Study Executive Summary:</p> <p><a href="https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf">https://www.horsham.gov.uk/data/assets/pdf_file/0019/131662/Transport-Study-2023-Executive-Summary.pdf</a></p> <p>The full Transport Study and Appendices are at:</p> <p><a href="https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base">https://www.horsham.gov.uk/planning/local-plan/local-plan-review-evidence-base</a></p> <p>Draft Duty to Cooperate Statement:</p> <p><a href="https://www.horsham.gov.uk/data/assets/pdf_file/0016/132613/Duty-">https://www.horsham.gov.uk/data/assets/pdf_file/0016/132613/Duty-</a></p>

			<a href="#">to-Cooperate-Statement.pdf</a>
44	Travel plans are an effective means of incentivising the use of sustainable modes of transport. Where these are required, development promoters must put forward clear targets and commitments to manage down the traffic impact of development and maximise the accessibility of and within sites by walking, wheeling, cycling, public transport and shared travel. Targets for achieving a modal shift to sustainable transport will need to be subject to sustained monitoring and management by an appointed travel plan coordinator. Advice on preparing and monitoring travel plans is contained in the planning practice guidance.	<b>Strategic Policy 24: Sustainable Transport</b> This policy requires submission of transport assessment or transport statement for major development, and requires travel plan where potential impact is significant. These should prioritise active travel, followed by public transport.	
46	With specific regard to HGV parking, government policy is clear in the Future of Freight Plan, 'Planning reforms for lorry parking' Written Ministerial Statement (8 November 2021) and the NPPF that development proposals for new or expanded goods distribution centres should make sufficient provision for HGV drivers, which should include overnight parking and an adequate level of welfare facilities. The need to increase provision for HGV drivers at roadside facilities is set out in paragraphs 79-82 of this circular.	Only marginally applicable as SRN is outside of HDC boundary. C1/22 paragraphs 79-82 were considered, however it was concluded that there is unlikely to be sufficient opportunity or need for HGV overnight parking on the major road network in the District outside of highways land within the control of WSCC, therefore a specific LP requirement is not warranted.	