



Homes  
England

# Horsham District Local Plan 2023-2040 Examination in Public

Matter 6 – Infrastructure, Transport and Healthy  
Communities

Hearing Statement

Date: November 2024





# Issue 1 – Whether the approach to Infrastructure Provision is legally compliant, justified, effective, consistent with national policy and positively prepared?

## 1. Introduction

- 1.1 This statement has been prepared by Homes England in its capacity as landowner and promoter of West of Ifield, Horsham, identified as a strategic site HA2 in the Horsham Local Plan 2023-2040.
- 1.2 This statement supplements Homes England’s previous representations to the Horsham District Local Plan Regulation 19 consultation. Where relevant separate submissions will be made in relation to Homes England’s other land interests.

## 2. Q2 - Is Strategic Policy 24: Sustainable Transport sound?

**a) With reference to the relevant evidence, would the Plan be effective in ensuring that any significant impacts from the development proposed on the transport network (in terms of capacity and congestion), highway safety and habitats can be cost effectively mitigated to an acceptable degree?**

- 2.1 West Sussex County Council (WSCC ) as highway authority in collaboration with HDC have developed their own SATURN highway model to support the Local Plan, as set out in the Horsham Transport Study Local Plan 2039 Transport Assessment (December 2022). A modelling Transport Assessment to support the draft Local Plan was produced by Stantec on behalf of WSCC. The SATURN modelling assesses the impact of a number of development scenarios on the local highway network managed by WSCC, along with impacts on the Strategic Road Network, managed by National Highways (as set out in Section 3 of the report). This has resulted in the development of a preferred development scenario. West of Ifield (Proposed Development) has been identified for the following land use quantum’s during the Local Plan period:

- Local Plan Period (Dwellings) = 1,600;
- Overall (Dwellings) = 3,000;

- Employment B1 (Plan Period, sqm) = 2,700sqm; and
- Employment B2 and B8 (Plan Period, sqm) = 6,300sqm.

2.2 Sustainable transport measures have been proposed to promote and encourage sustainable active transport modes as part of the development sites included in the emerging Local Plan 2039. Paragraph 8.6.3 of the Horsham Transport Study Local Plan 2039 Transport Assessment (December 2022) states that “the sustainable mitigation measures which have been included within the modelling assessment are deemed to be conservative in terms of the mode shift away from cars and therefore the physical mitigation requirements shown, may be reduced if more ambitious sustainable transport measures and targets made by individual site promoters are realised.”

2.3 The assessment takes a pragmatic and more pessimistic view on the delivery of sustainable modes, and mode shift that could occur. It is considered that additional mode shift could be delivered if additional interventions were considered, i.e. It does not test the ‘best case’ outcome and there can be a good level of confidence that the assumption made are both realistic and achievable. This is a reasonable assumption that is included in the Crawley Town Model which is adopted and has been accepted by the Planning Inspector.

2.4 This shows that even without a ‘best case’ outcome, the majority of highway impacts arising as a result of Local Plan growth would result in less than severe impacts, i.e. the overriding transport test as set out in Paragraph 115 of the NPPF . The scale of growth proposed over the Plan period can be considered to be acceptable in transport terms.

2.5 Where the modelling has been demonstrated that sustainable travel measures do not fully mitigate the impacts of the Local Plan, specific capacity led mitigation measures have been developed and assessed. The following junctions are shown to require physical mitigation within Horsham District (see paragraph 8.4.2):

- A24 / A272 Buck Barn;
- A24 / B2237 Hop Oast Roundabout; and
- A24 / A283 Washing Roundabout.

- 2.6 The transport modelling completed for the emerging Local Plan 2039 in the Horsham District, which includes realistic and achievable goals in terms of modal shift and the delivery of sustainable transport interventions shows that the proposed level of growth over the Plan period does not lead to any significant impacts that cannot be adequately mitigated to meet the ‘severity’ threshold set out in the NPPF (see paragraph 8.6.3).
- 2.7 With specific consideration of the West of Ifield allocation, the HDC model shows that under the “Reference Case” scenario of 1,600 dwellings that there would not be a ‘severe’ impact upon the three junctions located in the Horsham District set out above.
- 2.8 Furthermore, Crawley Borough Council (CBC) has undertaken a transport study to inform the Crawley Local Plan Review<sup>1</sup>. The transport modelling for this study has been undertaken using a Saturn Highway Assignment Model (HAM) for Crawley, known as the Crawley Town Model (CTM). The West of Ifield allocation has been assumed to be 3,750 dwellings which is far greater than the number used under the “Reference Case” scenario in the HDC model. WSCC are the highway authority responsible for both HDC and CBC, and have concluded that the Wol development will not result in a ‘severe’ impact upon the highway network and be suitably mitigated, NPPF paragraph 115.
- 2.9 With specific consideration of the West of Ifield allocation, the HDC model shows that none of the junctions identified are located within close proximity of the Wol development site, and the Wol proposals will bring forward a package of sustainable transport interventions both on and off site that will be to the benefit of both future residents and local residents in the vicinity of the site.
- 2.10 It is also valuable noting that the Gatwick Airport DCO modelling<sup>2</sup> has allowed for the Wol growth and this also identified that all committed and planned growth can be accommodated within the local road network, alongside a range of both capacity and sustainable transport interventions .
- 2.11 The sustainable transport strategy alongside the package included within the modelling assumptions is considered sound.

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<sup>1</sup> Crawley Transport Study Transport Study of Strategic Development Options and Sustainable Transport Measures Draft Crawley Local Plan 2021 – 2037

<sup>2</sup> Gatwick Airport Northern Runway Project, Transport Assessment Annex B – Strategic Transport Modelling Report (July 2023)

**b) Are the funding mechanisms and strategic transport improvements identified in paragraph 8.13 up to date and are they consistent with the schemes identified in the Infrastructure Delivery Plan?**

- 2.12 The Horsham District Council (HDC) Local Plan 2023-2040 sets out strategic improvements that have been identified as being necessary in the medium to long term to ensure that roads and junctions in the district operate safely.
- 2.13 The 'middle section' of the Crawley Western Multi-Modal Corridor (CWMMC) is identified as one of the strategic improvements, and this will be delivered by the initial phase of the West of Ifield development site. The emerging masterplan for the Wol development and the CWMMC includes for safe and attractive passage for pedestrians and cyclists following the guidance contained in Local Transport Note 1/20 – Cycle Infrastructure Design (LTN 1/20), public transport provision and road capacity.
- 2.14 The CWMMC has been designed as a multi-modal route with the following principles established:
- Single carriageway with a continuous bus lane in each direction.
  - Segregated cycleways separate from footways with priority at junctions.
  - Segregated footways, with widened area in the neighbourhood centre.
  - Varying speeds, including 20mph through the neighbourhood centre and 30mph elsewhere where appropriate.
  - Bus priority measures at junctions, to be explored further alongside highway modelling.
- 2.15 Homes England are at an advanced stage of technical design of the CWMMC which has been discussed extensively with the relevant local authorities and key stakeholders. The CWMMC accounts for bus priority, future proofing for traffic growth and provides connectivity for non-vehicular modes of transport. The HDC Infrastructure Delivery Plan 2024 states that the CWMMC will be completed in Phase

2 of the development. Homes England are committed to completing the multi-modal route 'middle section' prior to any substantial development being occupied .

- 2.16 The HDC Infrastructure Delivery Plan 2024 outlines that the 'middle section' of the CWMMC will be funded by Homes England plus potential further funding from WSCC / Home England / Government. However, the 'middle section' of the CWMMC can be fully funded and delivered as part of the West of Ifield development, meaning that it is not reliant on external funding sources and providing certainty on its deliverability within the timescales required.
- 2.17 Therefore, it can be determined that the funding mechanisms and strategic transport improvements identified in paragraph 8.13 of the Horsham District Council (HDC) Local Plan 2023-2040 is up to date and are consistent with the schemes identified in the Infrastructure Delivery Plan 2024 in respect to the 'middle section' of the CWMMC.
- 2.18 The second bullet point of paragraph 8.13 identifies 'A full Crawley Western Multi-Modal Corridor (sections of which may be delivered beyond the Plan period)' and this reference is also included within the IDP. As set out in response to part c) below, the traffic modelling that supports both the HDC and Crawley Borough Local Plan (now adopted) has identified that a full CWMMC is not necessary to deliver the allocated development within the HDC Local Plan , or the Crawley Local Plan.
- 2.19 Paragraph 8.13 and the Local Plan Infrastructure Delivery Plan should be amended to ensure that it is clear that 'A full Crawley Western Multi-Modal Corridor' is not necessary within the Plan period. If the remainder of the CWMMC were to come forward this would provide additional benefits in terms of the move towards higher levels of sustainable and active modes of transport in line with the overarching objectives of the Local Plan.

**c) What is the latest position with regard to when a "full" Crawley Western Multi Modal Corridor or sections of it is/are required to be completed to facilitate the development proposed in the Plan?**

- 2.20 The Crawley Borough Council (CBC) Transport Study (2022), used in the evidence base for the Draft Crawley Local Plan 2021-2037, provides an overview of the transport modelling undertaken to inform the potential impacts of three Draft Crawley Local Plan Scenarios for Crawley Borough for the period 2020 to 2035. The third scenario includes the assumptions for the Proposed Development, West of Ifield.

2.21 A sensitivity test was completed as part of the CBC Transport Study (2022) to consider the potential impacts of a Crawley Western Multi Modal Corridor (CWMMC) (The modelling note refers to the CWMMC as the CWLR). The sensitivity test indicated mixed results associated to benefits of the CWMMR to mitigate the impacts on the local highway network resulting from the West of Ifield development. The report concluded that:

*“Minor Roads to the west i.e. Faygate Lane and Rusper Road are forecast to benefit from reduction/relief in flows, but there are very little flow reductions on the rest of the network including Crawley Avenue. In most cases the CWLR improves junction performance compared to the scenario without the CWLR, however the improvements do not go so far as to match or better Reference Case performance.”*

2.22 Therefore, it is evident that the full delivery of the CWMMR is not essential for the delivery of the Horsham District Local Plan 2023-2040, as set out in the Crawley Borough Council Transport Study (2022).

2.23 The HDC Infrastructure Delivery Plan 2024 sets out the delivery timescales for infrastructure projects in the borough. The Infrastructure Delivery Plan Schedule 2024 sets out that the ‘middle section’ of the CWMMC to include shared transport, high quality bus provision and active travel facilities throughout the route, is anticipated to be completed in Phase 2 of the development. It is currently envisaged that the section of the CWMMC relating to the delivery of development included within the Local Plan, i.e. the section of road between Rusper Road and Charlwood Road would be delivered within the initial development phases to manage both operational and construction impacts. Charlwood Road is a good standard neighbourhood connector, with street lighting and footway / cycleway provision.

2.24 In addition, the Horsham Transport Study Local Plan 2039 Transport Assessment (December 2022) modelled an allocation of 1,600 dwelling for the West of Ifield site. The Crawley Town Model for CBC Local Plan which is now adopted, modelled an allocation of 3,750 dwellings for the West of Ifield development. The proposed 3,000 dwellings for the West of Ifield development has been shown to be accommodated by the ‘middle section’ of the CWMMC and therefore the full CWMMC is not critical to be delivered during the HDC Local Plan period.



**d) What is the latest position with regard to the impact of the Plan on the Great Daux roundabout?**

**e) Is the requirement for a bespoke-design space for home working justified and effective?**

2.25 Whilst the aspiration for home-working to be incorporated into design is supported in principle, we consider the policy is not fully justified and could potentially be onerous for residential developments. The concept that all homes will need to accommodate bespoke-design space for home-working is inflexible and could result in onerous design requirements, particularly for sites where they are delivering dedicated employment land on site. An example of this is, the allocation at West of Ifield which is incorporating 2ha of dedicated employment land in addition to incidental employment uses associated with education and retail facilities.

2.26 Other policies in the plan require a mix of housing typologies, sizes and tenures to meet the needs of the wider community. The concept of all homes, no matter their typology / size requiring bespoke home-working space is unnecessary and may result in housing units needing to be over-sized, thus impacting the ability to deliver effective densities. This element of the policy should, accordingly, be modified to encourage rather than require the provision of home-working facilities within homes, where appropriate and taking into account the impacts on viability, mix, density and the wider employment provision within the development.

### **3. Q4 - Is Policy 26: Gatwick Airport Safeguarding sound?**

**b) What is the latest position with regard to the Development Consent Order for the Gatwick Northern Runway Project are main modifications needed to this policy, other policies in the Plan or the Plan's evidence base to reflect this?**

3.1 The Development Consent Order for the Gatwick Northern Runway Project (the 'DCO') application was submitted in July 2023 and accepted by PINS in August 2023. Examination of the application ran for six months from 27 February to 27 August 2024. A decision by the relevant Secretary of State is due by late February 2025.

3.2 Whilst the intention of Policy 26 is supported, reference should be included within the policy wording towards the CWMMC and the necessary small-scale changes to road layouts within the safeguarding area that may be required to accommodate the first phase of the link road. In addition, the safeguarded areas should allow for ancillary infrastructure (such as SUDs) which can easily be adapted to be incorporated into any future runway scheme and do not impact bird strike risk.

3.3 Finally, the wording of Policy 26(5) is not considered to be sound as it places too much emphasis on the view of the relevant statutory consultees. Indeed, the wording in its current form would negate the local planning authority's responsibility to apply the planning balance in the determination of planning applications. Local planning authorities are the decision-makers of planning applications (Section 70 of the Town and Country Planning Act 1990 (as amended)) and therefore, in order for the draft Local Plan to be legally compliant and sound, this part of the policy must be removed.