WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Jason Hawkes
FROM:	WSCC – Highways Authority
DATE:	8th October 2025
LOCATION:	Land West of Ifield Charlwood Road Ifield
SUBJECT:	DC/25/1312 Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.
RECOMMENDATION:	More Information

Background

1. The following provides WSCC Highways formal response on the transport implications of the proposed West of Ifield development.

2. The planning application has been submitted as a hybrid with elements to be approved in outline form and others in detail. The following comments are consequently split to cover those matters in outline form and those in detail. It's acknowledged that there will be some crossover between the two elements. This has been accounted for where necessary.

3. WSCC Highways would confirm that the proposals have been the subject of pre application discussions that have taken place over a number of years. Where necessary, aspects of these discussion are referenced in this response.

4. For clarity, WSCC have listed those documents and drawings reviewed in the preparation of this response. These are set out in Appendix 2.

Policy Position

5. WSCC Highways understand that the site is not formally allocated within any adopted local plan although the site is recognised as being a preferred option within the draft Horsham Local Plan 2023-2040 Regulation 19 consultation. Whilst WSCC Highways have been mindful the requirements as included in the draft HLP 2023-2040, it is recognised these ultimately have no weight. These requirements are included within Appendix 1.

6. WSCC Highways have assessed these proposals primarily against the relevant paragraphs (namely 115, 116, 117, and 118) within the National Planning Policy Framework. These are set out in full within Appendix 1.

Outline Matters

Active Travel (including passenger transport)

Transport Vision

7. Although not referenced as a 'vision' for transport for the development, the submitted Transport Assessment (TA) includes aspirations to encourage high levels of bus use and to reduce offsite trips. WSCC Highways in-principle are supportive of such an approach. The Applicant will be aware of the requirements within the National Planning Policy Framework with regards to a 'vision-led' approach and further comments are made in these respects in the following response.

Walking and Cycling

8. From the submitted plans, it's apparent that the Applicant is proposing high quality walking and cycling infrastructure within the boundaries of the site. The submitted Design Code will ensure that suitable infrastructure is provided within the detailed layout of individual parcels and future infrastructure that isn't covered by this application. There are no concerns regarding on-site infrastructure. Further comments are made in terms of the detailed provisions below.

9. Beyond the site boundary, external connections are referenced within the TA. The actual details and commitment for direct delivery of these routes are very much lacking. This is very much a concern given the trip demands that the development will generate and the ability of the Applicant to achieve the mode share applied within the modelling work.

10. With reference to the 'Movement and Access' Parameter Plan, this shows various walking and cycling connections into the existing highway network. Of specific note,

- The Primary Walking and Cycling route terminates at the red edge/site boundary; the route isn't indicated to actually connect into anything beyond the site. The provision of an incomplete Primary route is unacceptable. It must be

clearly demonstrated as part of the current application that a connection beyond the site is achievable, what this looks like (with a presumption being that this will be hard surfaced and lit), and how this ties into the existing network including onward connections.

- With the above points, this is taken as an error on the Parameter Plan; the plans within the Design Code otherwise show these routes connecting. As a fundamental point however, there should still be consistency across the Parameter Plans and the Design Code. The Applicant should review both the Parameter Plans and Design Code and amend where required.

- The Secondary Walking and Cycling Route connects to the existing highway network opposite Middleton Way. There are again no details in terms of what is achievable or onward connectivity.

- There are also connections shown into existing public rights of way (mostly footpaths). These should be reviewed in terms of whether these provide direct access between the development and other services and therefore could be regularly used and would need to be upgraded as a result.

11. The TA makes reference to funding being provided to various routes within the Crawley Borough Council Local Cycling and Walking Improvement Plan (LCWIP). It's unclear how developed and feasible these are, and therefore how accurate the costs listed are; based on the wording within the LCWIP, the proposals within this are indicative and haven't been subject to any detailed design or costing. It's also unclear who the Applicant intends to receive any contribution; these schemes have been developed by CBC and not WSCC.

12. It's apparent that the LCWIP routes L (towards Crawley town centre) and P (towards Manor Royal) provide important connections to employment, retail, as well as education (i.e. the proposed secondary school has the potential to generate significant demands). The Applicant should therefore consider direct delivery of these routes in either in part or in full. Direct delivery would ensure the timely construction of these routes.

13. With LCWIP Route M, there again would be merit to direct delivery of this route. The Applicant should note that there is an existing shared use cycle route that runs northwards along Ifield Avenue as far as Popes Mead Bowling Club; this is approximately 220metres south of the proposed CWMCC/Charlwood Road junction. It's unclear why the Applicant hasn't proposed the extension of this shared use route up to the proposed CWMCC/Charlwood Road junction to provide a more complete arrangement for cycling. As shown, provision for cycling ends at the CWMCC/Charlwood Road junction and at Popes Mead rather than joining up. It's noted that the LCWIP Route M proposals would upgrade the infrastructure for cycling along Ifield Avenue. The provision of a shared use route though would still be better than cyclists being forced onto the carriageway.

Bus Strategy

14. The TA outlines two new bus routes to be funded as part of the development. Route A is indicated to run between the development and Gatwick Airport via Crawley town centre and Three Bridges Station. Route A will make use of a

proposed bus gate onto the southern section of Rusper Road. Route B is to run through existing residential areas of Ifield West to Gatwick Airport via the proposed development (using the proposed CWMCC) and Manor Royal. Bus Route B will also use the proposed Rusper Road bus gate. Routing is shown on figure 6.1.

15. Route A is indicated to be provided prior to any residential dwelling being occupied (reference paragraph 6.20) with an initial 15-minute frequency increasing to 10 minutes as the development is built out. The Applicant acknowledges that Route A will require financial support until patronage levels increase to make the service commercially viable. Route B is indicated to operate with a reduced frequency initially but increasing to 10 minutes prior to the completion of the development. Route B is indicated to commence at a later stage and be commercially viable from the outset.

16. WSCC Highways fully acknowledge the proposed bus strategy and the Applicants aspirations in terms of encouraging high levels of bus use amongst future residents. However, the details submitted within the TA are very light on actual detail. As a result, concerns are raised as to the deliverability of the bus strategy especially as the Applicant intends only to provide financial contributions towards the bus services; the risk is therefore being transferred to WSCC and the bus operator to meet any shortfall should the Applicants contributions be insufficient.

17. The Applicant will need to submit a bus strategy. This must include all relevant assumptions applied by the Applicant to forecast bus patronage and therefore funding requirements as the development is progressively built out.

18. A review mechanism will also be required as part of any bus strategy. Such a mechanism will then allow for any assumptions agreed through the initial assessment, and consequently any contribution, to be adjusted accordingly. The review mechanism could for example account for slower than expected housing delivery, lower bus patronage rates, or increased running costs. It is accepted that a cap will need to be agreed over funding to provide some level of financial certainty for the Applicant.

19. Ultimately, there is a level of risk concerning the funding and ultimately the delivery of a bus service particularly if fixed and over-optimistic assumptions are applied.

20. As part of the overall bus strategy, the Applicant will also need to demonstrate that the proposed service can be reliably achieved. For example, it's noted that both services route to Gatwick Airport. In practice, Route A may not need to do this given that residents can initially change buses within Crawley to use other services to the Airport, and thereafter once operating use route B to access (potentially more quickly compared with route A) the Airport. Route A is also indicated to use Pegler Way and Haslett Avenue rather than The Boulevard and the bus only section of The Broadway to reach the existing bus station, thereby incurring a longer journey time.

21. The Applicant needs to be quite clear as to whether this routing shown on figure 6.1 is fixed or indicative. It may be more appropriate to include a list of

destinations to be served by the bus routes and then determine exact routing in consultation with the bus operator. WSCC would wish to include a level of flexibility within any routing rather than be beholden to routing that ultimately is inefficient and difficult to operate.

22. Relating to reliability, it's noted that no off-site improvements are intended concerning bus access. The Applicant will need to be robustly demonstrate that the suggested service levels are achievable without off-site works. As an observation, there are notable levels of on-street parking on residential streets on Route A and B that will hinder a two-way frequent bus service.

23. It's also unclear how Route A is intended to operate within the development itself with there being no obvious loops or turning areas. Given the intention to commence the service at an early point there must be some certainty that the required infrastructure will be available. The trigger point for the commencement of Route A would need to be linked to the necessary infrastructure (which shall need to be defined) being delivered.

24. The proposals include a bus only access onto the southern section of Rusper Road. Details of the bus gate form part of the Phase 1B infrastructure and as such comments are made on this within the 'Matters Proposed in Detail' section.

25. The proposed bus gate will require a Traffic Regulation Order to make enforceable that this is bus only. WSCC will require the Applicant to submit for agreement a scheme of monitoring to determine levels of compliance with the TRO. Should the monitoring identify a poor level of compliance, WSCC will require the Applicant to fund or implement additional measures to further support the TRO. Additional measures are likely to include camera enforcement.

26. A s106 obligation will be required to ensure a scheme of monitoring is submitted and agreed with WSCC prior to the bus gate first being used. The monitoring shall include a means to trigger additional works should poor levels of compliance with the TRO be recorded.

27. Further highway works are proposed on Rusper Road immediately after the proposed bus gate. The bus related works on Rusper Road are shown within the TA on figure 6.2. In summary, these works show the provision of two build outs and related passing places where buses are required to give way. These are proposed as the carriageway width on Rusper Road between the two build outs is of insufficient to enable two opposing buses to pass.

28. The Applicants approach is noted, as is the comment within 6.8 of the TA that indicates that such works have been agreed by WSCC. This is not WSCC's understanding however. Based on the submitted plan, it is evident that there is sufficient highway land available to widen Rusper Road sufficiently to enable two opposing buses to pass. This would remove the need for the two build outs and passing places. Given the regularity of buses intended to use this section of Rusper Road, it would be WSCC recommendation that carriageway widening is provided rather than build outs.

29. Tracking will also be required to demonstrate that two-way bus movements are achievable on the remainder of Rusper Road.

30. Any works required to accommodate two-way bus movements on Rusper Road will need also to be provided ahead of the Route A bus service commencing.

31. The works shown on figure 6.2 also include the provision of a side road entry treatment on Arthur Road as well as the placing of the existing Rusper Road/Hyde Drive mini-roundabout on a raised table. The reasoning for these two isolated highway schemes is unclear and as shown provided little benefit. If pedestrian/cyclist improvements are intended (for which there would be merit given this is will likely form a key route to the secondary school), these should form more of a complete scheme with details provided.

32. WSCC would further highlight that any highway works will need to be the subject of a Stage One Road Safety once a scheme has been agreed in principle.

Rail

33. Ifield railway station is located to the immediate southeast of the development. Proposed bus route A is indicated to stop close to the existing station. Figure 6.3 within the TA also indicates that the majority of the proposed development is within 1.6km walking distance of the station, albeit the assessment makes use of iso-chromes/as the crow flies, rather than actual walking distances. There is also the potential for cycling trips.

34. The TA identifies potential improvements within the station itself. These will need to be agreed with the station operator, with suitably worded obligations to ensure any agreed works are delivered.

Travel Planning

35. An Umbrella Travel Plan (UTP) has been submitted by the Applicant. WSCC understand that the purpose of the UTP is to set the framework for which phase or use specific travel plans will then follow. Bespoke travel plans will be required for the educational uses, and these are not covered by the UTP.

36. For the purposes of the submitted UTP, the following comments would be offered. These are made against the specific numbered point in the UTP.

37. As more of an over-arching comment, the scope and applicability of the UTP should be clearly outlined. It's understood that the UTP applies to residential and commercial uses, although the submitted document is written largely on the basis of it being applied to residential uses. The UTP may need to be expanded so as to define its scope and include further measures that apply to other uses.

38. 3.36 to 3.42 – The Applicant will need to prepare and submit a separate car club strategy document. It's recommended that this strategy sets out the number of car club vehicles to be funded, approximate locations, and includes a clear means of monitoring car use and from this a way to trigger the provision of additional vehicles when required. WSCC accept a base level of car club vehicles should be provided from an early stage in the development with further vehicles then provided as demands require them.

39. 3.41 – The funding of car club membership for 3 months seems short especially if this is intended to influence longer term travel habits. A much longer time period should be included to enable travel habits to be meaningfully changed.

40. 3.43 to 3.47 – Given the UTP is intended as an overarching document, it's assumed that specific monitoring requirements will be covered within phase specific TPs. The UTP should though set out the expectations as to when monitoring shall commence and the duration for these phase specific TPs.

41. Linked to the above, questionnaires are referred to. From experience, questionnaires have very poor response rates unless directly administered. Whilst questionnaires can be used, these should be considered supplemental rather than sole sources of data collection.

42. 4.7 – The UTP should include common targets that are applicable to all future phase specific TPs. The UTP should be updated accordingly.

43. 5.1 to 5.6 – As stated in previous comments, WSCC understand the UTP to be an overarching document with phase specific TPs to be submitted as necessary. The delivery of these phase specific TPs will fall to the respective developer. Whilst the Applicant will ultimately have responsibility for the overall 'transport vision', they are not expected to be required to monitor the implementation of the UTP or phase specific TPs.

44. 5.7 and 5.8 – The measures listed are more of a strategic nature and will be secured as part of the current outline application. Individual phase specific TPs will be expected to provide further measures relevant and proportionate to the phase.

45. 5.9 to 5.12 – Similar to the previous comment, the measures listed are more strategic in nature and should therefore be delivered as part of the outline consent. Phase specific TPs will be expected to undertake further marketing.

46. 6.1 and 6.2 – The measures listed are taken as indicative. It will be for the phase specific travel plans to put forward appropriate measures (hard and soft, which shall include financial incentives) in order to reach any targets.

47. Related to the above, there are what could be defined as 'strategic measures' listed. This includes amongst other things the provision of infrastructure, bus service funding, mobility hubs, and car clubs. It's recommended that these measures are listed separately given they are beholden on the Applicant to deliver.

48. The Applicant should also be held responsible to negotiate any subsidised bus travel for the development as a whole. This should be agreed with the local bus operator with any discounted fares clearly listed in the UTP. The value of sustainable travel vouchers should also be listed.

49. 7.1 – As noted above, it will be for phase specific TPs to include appropriate monitoring and review mechanism.

50. 7.2 – WSCC will have oversight on the application of the UTP and subsequent phase specific TPs. WSCC will seek an auditing fee as part of the outline planning application to cover this future ongoing involvement.

51. 7.5 and table 7.1 – Travel surveys for phase specific TPs should be undertaken as and when there are a reasonable number of dwellings occupied in the monitored phase to provide a sensible sample size. Ordinarily, this may be occupation of 50% of dwellings. Monitoring shall then be undertaken every other year for a period of 5 years or until the phase is fully occupied; annual monitoring as suggested in table 7.1 would be unnecessary.

52. 7.6 – Reference is made to each future RM application having a travel plan that may or may not be linked to the master Umbrella TP. WSCC fully expect that the Umbrella TP will provide the framework against which all future phase specific travel plans will follow. The exception for this is for land uses that are not specifically covered within the Umbrella TP.

53. 7.11 – The UTP should include a requirement for a further single period of monitoring should targets not be met and after remedial measures have been implemented.

54. In summary, WSCC consider that the UTP should be revised to reflect its purpose as a framework against which future phase specific travel plans should be prepared.

<u>Trip Generation and Highway Impact</u>

Overall Approach

55. The overall approach and scope of the TA have been the subject of ongoing discussions with WSCC Highways for a number of years. The overall approach is set out within the Trip Generation Technical Note (TA appendix B) dated 7th December 2021.

56. Table 8.1 within the TA is taken as the definitive list of land uses and areas included within the modelling. From other sections of the TA and the Trip Generation TN, there appear to be potential omissions and differences of land uses and areas respectively modelled. Paragraphs 4.9 and 8.13 for example refers to industrial and logistics space (as does the application description) but these are not listed in table 8.1. The Applicant should confirm.

57. There are also various statements stating that the scope of the TA has been agreed. The discussions relating to the scope date back a number of years with there having been limited recent discussions. Elements of the scope are agreed although other elements are dated and potentially out of date.

58. It should be noted that the National Planning Policy Framework has been updated since the scope was previously agreed. Paragraph 118 of the NPPF states,

59. *All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.*

60. There is limited guidance available in terms of what the NPPF anticipates from a vision-led approach. That guidance that is available suggests alternate modelling scenarios based on differing mode shares following on potential transport interventions. A key element is that this approach will then include a means of monitoring to ensure the 'vision' is being achieved. Further proportionate remedial actions may then be triggered if the 'vision' is not being realised.

61. For the purposes of the TA submitted, limited reference is made to a 'vision-led' approach, although three scenarios with varying levels of optimism concerning mode share are indicated within the TA (paragraph 8.2) and the Trip Generation TN. From this only scenario 2 (described as balanced in terms of reasonably optimistic mode shares) is then applied.

62. Although different scenarios could be tested, the application of a single scenario in this instance is accepted. Further comments are made throughout this response in terms of the mode shares and assumptions applied with it not intended to repeat these here.

63. The Applicant will still clearly need to set out their approach concerning paragraph 118 of the NPPF and most important detail how this is to be applied and monitored for the purposes of this development. This must also set out further actions (remedial works) should the referenced mode shares not be achieved, and highway impact be greater than expected. This should focus on sustainable modes firstly (including both soft and hard measures) although highway capacity measures may also be necessary. The monitoring and remedial strategy should be agreed as part of this application and then form part of the s106.

Summary of Modelling Inputs

64. The highway modelling consists of different elements. At a high level, the key aspects are summarised as,

- The use of TRICS data to identify the number of person trips that are estimated to arise from each individual land use proposed during the AM and PM network peak hour,

- The use of National Travel Survey data to identify trip purposes and the percentage splits arising from the proposed residential dwellings,

- The percentage of trips remaining within the development and those travelling out (internal and external trips). This should be noted as varying depending on land use and the trip purpose from residential uses,

- Determination of mode share for external trips. This is based on the Applicant's Transport Strategy and overall transport 'vision' for the site.

65. With regards to these specific matters, these have been previously discussed with WSCC Highways and are for the most part agreed.

66. Taking account of the above, the TA then identifies the total multi-modal external trips anticipated to result from the development. This is set out in table 8.41, which is reproduced below.

Table 8.41: Development External Trip Generation by Mode

Mode	AM Peak (0800 – 0900)			PM Peak (1700 – 1800)		
	Arrive	Depart	Two-Way	Arrive	Depart	Two-Way
Train	65	74	139	106	78	184
Bus	297	276	573	418	346	765
Car Driver	463	476	939	724	627	1,351
Car Passenger	210	262	472	400	324	724
Bicycle	92	121	213	174	127	301
Walk	79	100	179	147	112	259
Total	**1,206**	**1,309**	**2,515**	**1,969**	**1,614**	**3,583**

67. With regards to the assumptions within the modelling, WSCC would highlight that the mode share for the use of the bus (indicated at 20% for residential and employment trips, and 55% for secondary school trips) is high and may not be realised. Similarly, a percentage of external walking trips are indicated although table 2.3 within the TA indicates very few uses within what may be considered a reasonable distance of the site. The percentage of walking and bus trips may consequently be overestimated.

68. There are also a number of trips indicated by rail with the nearest stations being external to the site and consequently would entail a walking/cycling/bus/car trip first. Rail trips perhaps should then have been redistributed to other modes.

69. Whilst external mode shares may be considered over optimistic, these aspirations form part of the Applicant's transport vision for the site. Therefore, although a concern, WSCC would accept them for the purposes of the TA. As noted above, in line with current advice, the Applicant will need to submit a comprehensive monitoring and remedial action plan should these mode shares, and ultimately the transport vision not be achieved.

Distribution of Trips

70. For those external trips indicated to be made by car drivers, the Crawley Town Model has been used to distribute trips and determine which parts of the network will experience traffic growth arising from the development. The CTM has been developed and used primarily for the purposes of supporting the Crawley BC Local Plan. Based on the outputs from the CTM, specific junctions have been identified where an impact is expected to be significant. Appropriate industry accepted modelling programs have then been used to look in detail at the operation of these junctions.

71. The modelling will account for the proposed works to divert Rusper Road and the impact this will have on traffic flows.

Committed Developments and Planned Growth

72. The CTM is understood to include all relevant committed developments for the model as well as accounting for future planned growth included within the Crawley Local Plan. The model also accounts for potential growth at Gatwick Airport where the second runway has been recently approved.

73. The CTM itself was developed a number of years ago with assumptions within this pre-dating the Covid pandemic and the subsequent changes that have resulted to peak time traffic. The CTM also includes potential high traffic growth assumptions that have not in practice been realised. The CTM is therefore likely to be over-estimating base levels of traffic in the various scenarios tested.

74. Due to the construction of the proposed West of Ifield development extending beyond the horizon year within the CTM, an additional future year of 2041 is required. This has been derived by applying traffic growth rates taken from TEMPro (the National Traffic Model) to the CTM 2035 flows. This approach is accepted as well as that for committed developments is accepted. Again, it is noted that an older version of TEMPro has been used that includes higher growth rates compared with more recent versions.

75. Overall, the CTM is very likely to be overestimating base and consequently future levels of traffic.

Modelling Scenarios

76. Future year modelling scenarios are included for 2025, 2029, and 2041. For these, it's noted that,

- For 2029 and 2041, scenarios are indicated to have been undertaken that include a full CWMMC running from the A264 to the A23; it's otherwise understood that the other 2029 and 2041 scenarios include only the middle section of the CWMMC (i.e. that forming part of the current application).

- The full development forming part of the current application is included within the 2041 future year. This includes scenarios with and without the proposed development.

- The 2029 opening year includes only 25 dwellings, 6FE for the secondary school as part of the proposed development,

- Potential growth at Gatwick Airport (i.e. the second runway) is included only in the 2041 future year. Assumptions relating to Gatwick are taken from the documents submitted as part of the separate Development Consent Order. With regards to Gatwick, the modelling work associated with the proposed second runway assumes that this will be operational by 2029. However, all of the Gatwick related highway infrastructure improvements as well as overall growth associated with the second runway will not be realised until a later time. The inclusion of the completed Gatwick proposals in the 2041 scenario for the West of Ifield development is considered appropriate.

Scope of Assessment

77. The outputs from the model will indicate how and where the highway network will be impacted. No outputs from the model or distribution diagrams have been provided however. As such, whilst a number of junctions have been

investigated in further detail (which are covered below), it's not possible to determine if the extent of the assessment is complete. There are also junctions that haven't been assessed that lie between junctions that have been assessed. Some of these junctions may not require assessment but others (A264/A2220 Cheals Roundabout, for example) may.

78. Distribution diagrams would also clearly show the impact arising from the closure of Rusper Road in redistributing traffic on the wider highway network. This includes the impact arising from the development on other roads (including rural lanes) that may need to be mitigated. Issues in these respects may not be capacity related but more require an assessment on safety of users especially where non-motorised road users are expected to be present.

Model Outputs and Individual Junction Assessments

79. A list of nine junctions individually assessed are set out in paragraph 9.45 of the submitted TA. Comments here are made on those assessed junctions where necessary based on the modelling outputs.

80. As noted in paragraph 9.52 and as acknowledged by WSCC, it is recognised that a highway model becomes increasingly unstable once theoretical capacity has been exceeded. As such, queues and delays for over-capacity junctions are viewed with a degree of caution and may not represent an actual situation. The fact that a model is indicating an over-capacity junction is still a potential matter of concern.

81. As already acknowledged, both the CTM and the TEMPro growth rates used to produce the various scenarios are likely to be over-estimating base levels of traffic and traffic growth. The modelling in these respects is likely to be overly robust.

82. It's also recognised that across some of the individual models, certain junctions operate better with the proposed development than without. This is assumed as a consequence of the middle section of the CWMMC (as well as the redistribution resulting from the Rusper Road diversion) being delivered. This is a matter that would become clearer with distribution diagrams based on the CTM outputs.

83. The following comments are based on the outputs available within the TA. Some of these include only the results rather than details of the inputs. WSCC would request full copies of the junction models. Copies of the LinSig models should also be provided directly to WSCC.

84. *Crawley Western Link/Charlwood Road Proposed Signalised Junction* – Although paragraph 9.63 of the TA implies that this junction would operate within capacity, there are arms within the modelled period that operate close to or over capacity; for a signalised junction, the capacity is indicated by the Degree of Saturation where ordinarily 85% is sought to be achieved especially for new junctions such as this. The model is indicating DoS of 90% or more on several arms.

85. WSCC has other design related concerns with this junction as further set out below. There will clearly need to be further discussions relating to this aspect.

86. *Ifield Avenue/Warren Drive Roundabout* – the majority of 2041 with and without development scenarios indicate minimal queues and delays. The exception to this is in the PM peak on the Ifield Avenue (south) arm where significant issues are forecast. The Applicant is consequently proposing to signalise this junction. The implementation of signals resolves the indicated issue.

87. It must also be recognised that traffic signals will also provide controlled crossings for non-motorised road users and potentially bus priority measures.

88. WSCC will require a Stage One RSA for the proposed works.

89. The Applicant needs to be clear also as to whether these works form part of the application or are to be delivered if future monitoring indicates them as necessary; the TA indicates the former, whereas the Infrastructure Delivery Plan (IDP) suggests the later.

90. Ifield Avenue/Stagelands Priority junction – the 2025 base as well as the 2041 without development modelling all indicate potential existing capacity issues without accounting for the additional development. The 2041 with development scenario indicates a worsening of performance across all time periods. As per the previous junction, the Applicant is consequently proposing to implement traffic signals. The implementation of signals resolves the indicated issue.

91. It must also be recognised that traffic signals will also provide controlled crossings for non-motorised road users and potentially bus priority measures.

92. WSCC will require a Stage One RSA for the proposed works.

93. The Applicant needs to be clear also as to whether these works form part of the application or are to be delivered if future monitoring indicates them as necessary; the TA indicates the former, whereas the IDP suggests the later.

94. *Ifield Avenue/Ifield Drive signalised junction – A* comparison of the 2041 with and without development scenarios indicates a mix of betterment on some arms and worsening of performance on others, presumably as a consequence of the increased and redistribution of traffic resulting from the development and Rusper Road diversion respectively.

95. The only comment WSCC would make is that a 240 second cycle time is indicated within the modelling outputs. Given this is an existing junction, WSCC would ask for confirmation that cycle time is based on observations or the actual specification.

96. *A23/Ifield Avenue roundabout* – A comparison of the 2041 with and without development scenarios implies a betterment to the worst performing A23 Crawley Avenue east arm; for all other arms, the development has no discernible impact. It's presumed this betterment results from traffic redistributing as a result of the Rusper Road diversion. However, model outputs/distribution diagrams are required to demonstrate whether this is actually the case and to ensure that any re-routing traffic will not generate other negative impacts.

97. This roundabout was also identified within the Crawley Transport Study, dated February 2022, as operating above capacity in the modelled Local Plan 2035 future year. An improvement scheme was identified with this referred to in the submitted TA. There are some notable differences in terms of performance between the modelling prepared for the current planning application and that for the Crawley Transport Study. The Applicant should review to ensure the modelling is consistent between the two documents.

98. *A264/Sullivan Drive (Bewbush Manor) Roundabout* – The 2025 base modelling implies significant queues and delays, with these subsequently worsening in future years. WSCC would ask whether there has been any validation of these queues for the purposes of the base modelling. It is questionable whether the model is fairly representing the existing and therefore the future operation. The Applicant should undertake to validate the model and amend the model to reflect the actual observed performance.

99. *A264 Faygate Roundabout* – A similar situation is noted as to that for the A264/Sullivan Drive Roundabout. Again, WSCC would ask for confirmation that the base year model has been validated against the existing observed performance.

Summary

100. There are various issues identified within this section that require assessing. A key issue is the submission of a distribution diagrams. These will assist in understanding which routes development traffic is forecast to use as well as the consequences of diverting Rusper Road.

101. Similarly, the Applicants use of high levels of sustainable transport mode shares (and consequently reduced private car use) within the modelling is raised. Ultimately though, the Applicant will be required to implement monitoring with clear remedial actions. This approach allows for mitigation to be secured but ultimately revisited should the forecast traffic flows not materialise.

102. In reviewing the highway capacity impacts and as an overarching comment, WSCC recognise that the development will generate additional vehicle trips on the highway network. This inevitably will result lead to increased congestion. The development is not however required to resolve pre-existing conditions, but only to ensure that it does not result in severe capacity impacts in line with the NPPF.

103. WSCC fully recognise that it may be in appropriate and undesirable to implement significant highway mitigation schemes even where increased traffic congestion is identified; this approach is ingrained in the WSCC Local Transport Plan and is similarly included within the Crawley LP Transport Study. Such major capacity transport schemes often only serve to increase traffic flow and are detrimental to other non-motorised road users.

<u>Layout and Design Matters</u>

104. As noted already, the application is submitted with certain matters in detail and others in outline form. For the purposes of this section, comments are made in regards of the submitted Design Code and Movement and Access

Parameter Plan. These documents effectively set out the design principles that will govern the design of infrastructure within future reserved matters applications. It's therefore important that the details within these are consistent and accurate.

Design Code

105. Figure 25 sets out pictorially the Street Hierarchy Plan. Within this, there is 'The Primary Street' (namely the infrastructure forming part of Phase 1A, which is indicated on the plan in pink) and a 'Primary Street' (indicated in purple, which is also indicated as a 'Primary Road' on figure 10). The subsequent section of the Design Code (3.1.5 Street Design – Summary Table) has only one entry for 'Primary Street' and nothing for a 'Primary Road'. Can the Applicant confirm that this single entry in the table covers both 'The Primary Street' and the 'Primary Street'/'Primary Road'.

106. 3.1.7. includes a typical section of a 'local centre shared street. None of the plans indicate a 'local centre shared street' however.

107. The various street design sections include reference to kerbing. With the exception of the use of flush kerbs to pedestrian and cycle routes, the broad principles indicated are acceptable. However, WSCC would reserve the right through the detailed design process to review and amend kerbing to suit specific situations that may arise.

108. With the suggested use of flush kerbs to pedestrian and cycle routes, this is unclear and would require further clarification from the Applicant; a typical section for example. WSCC understanding is that flush kerbs are to be used to effectively define pedestrian and cyclist areas on segregated routes. Clearly, a flush kerb will offer little in terms of actual segregation. The Design Code should otherwise clearly specify how segregated routes are to be defined for respective users.

109. Figure 15 (Pedestrian and Cycle Plan) doesn't include all the crossing points shown within the respective Phase 1A infrastructure plans. This point is perhaps irrelevant though given that these crossings are within the detailed infrastructure plans.

110. Reference is made within section 3.1 and 3.1.1 to external connections and existing public rights of way (PROWs). There are however no typical sections showing the design of any of these works. Given the importance of these connections (as referenced within Design Code paragraph 3.1, OPA Coding point 2), there seems merit in securing the principles within the Design Code.

111. 3.1.2 covers bus stops and mobility hubs. None of the figures indicate the locations of the mobility hubs. The locations should be shown. If these mobility hubs are intended within Phase 1A or 1B, details should be submitted now for agreement within these detailed applications or at the very least subject to a planning condition requiring details to be submitted.

112. As a fundamental point, it must be very clearly set out who is to maintain the mobility hubs. WSCC as Highway Authority are unlikely to take on responsibility. The elements within these can still be provided but the

responsibility for these to a 3rd party will be covered under a separate license or agreement.

113. 3.1.2 should also cover bus stop infrastructure and locations. The Design Code should set out the bus stop locations and infrastructure that is to be provided. Ideally this should include covered seating and real time information. Again, future maintenance is a consideration given that WSCC do not adopt or maintain bus shelters.

114. 3.1.4, OPA Coding 3 requires pedestrian and cycle priority at junctions and crossings. Within the design of Phase 1A, priority is given at some but not all junctions. The reasoning for this is that certain junctions are expected to be busier and therefore priority for pedestrians/cyclists is not considered appropriate. The wording within this OPA Coding point should therefore include flexibility so as to not require priority for those crossing where this is deemed inappropriate.

115. 3.1.5 Street Design Summary Table and subsequent street sections indicate significant amounts of planting as well as SUDS features. Whilst these elements may be acceptable, it's not a given that WSCC will adopt these elements as part of the public highway as these may include non-standard planting and require high levels of maintenance. This should be acknowledged by the Applicant with there being recognition towards alternate maintenance regimes being required.

116. It's noted that there doesn't appear to be any reference to materials within the Street Design Summary Table or following sections. WSCC Highways have no particular issue with this approach with materials to be agreed as part of future highway adoption agreements.

117. Through the Design Code and TA, there are references to car and cycle parking. The principles indicated are acceptable to WSCC with a balance to ensure suitable but not overprovision. There is a need to retain some flexibility over future car parking provision to fairly reflect the need for residents to travel but also to reflect the implementation of the transport 'vision' for the site.

118. The Applicant will also need to ensure that suitable mechanisms are put in place to cover the maintenance of EV charging (both cycle and car) in shared areas. It's accepted that this more a matter for the design of individual parcels with details being required by condition.

Parameter Plan 2 – Movement and Access

119. Comments in relation to Parameter Plan 2 are made at various points within this response. It's not intended to repeat those comments here. Parameter Plan 2 however needs to be revised both in terms of the details shown on it and the terminology used so as to be consistent with that in the Design Code.

<u>Other Matters</u>

Construction Traffic

120. A Construction Traffic Management Plan (CTMP) has been submitted for Phase 1. From the CTMP, it's apparent that this is very much an outline document that will need to be embellished and added to once a contractor has

been appointed. The CTMP is therefore treated more as a framework with a final version to be submitted and agreed prior to development commencing.

121. The CTMP covers the delivery of the Phase 1A and 1B infrastructure. Two points of vehicle access are indicated; via Rusper Road and from Charlwood Road with vehicles routing from the A23 for both. WSCC Highways recognise that multiple access points are required in order to enable the timely delivery of on-site infrastructure.

122. The specific routing along Rusper Road with traffic routing from the A23 via Gossops Drive, Overdene Drive, and Tangmere Road is not ideal (particularly as these are predominantly residential roads with Tangmere Road and Rusper Road being narrower in width). The Applicant should therefore review potential routing options (albeit WSCC recognise that these are very limited) and identify any mitigation that may be required to accommodate HGVs. Options, for example, involving one-way routing involving Rudgwick Road could be explored to avoid two-way HGV movements on Tangmere Road. The use of Rusper Road must in any case be restricted and used only for clearly defined purposes.

Phasing and Infrastrucure Delivery Plan (IDP)

123. The submitted IDP document (table 6.1, page 51) implies that the CWMMC is to be opened prior to the occupation of any build other than the proposed Secondary school. If the Secondary school is to open ahead of the CWMMC, a means of access would be required from Rusper Road. This interim arrangement isn't covered within the TA or any other document reviewed by WSCC as part of this application.

124. This approach isn't necessarily unacceptable given that it will be temporary. If the Secondary school is to open ahead of the CWMMC being opened, the Applicant should clearly set out their intentions regarding access.

125. The IDP otherwise includes various transport/highway mitigation. Many of the items are referenced within these comments and will be the subject of further discussion. No further comments are made here.

Matters Proposed in Detail

126. The application includes matters of access as in detail. In summary, vehicular access is achieved via a diverted Rusper Road to the west and to Charlwood Road/Ifield Avenue to the east. Access to the east will be via the proposed CWMMC. As already identified, there will be additional walking and cycling accesses, as well as a bus only route onto Rusper Road.

127. As noted, alterations are proposed to the existing Rusper Road where this runs through the development. In summary,

- The existing Rusper Road (that runs north to south through the development) will be closed as a through route to all traffic where the Crawley Western Multi-Modal Corridor (CWMMC) cuts across it in an east to west direction.

- The northern arm of Rusper Road will be diverted onto a new route to the west and will join the CWMMC at a new signalised junction. The existing

northern section of Rusper Road will be retained as a no through road and incorporated into the development to provide access to proposed residential parcels.

- The existing southern arm of Rusper Road will be retained as a no-through road and continue to serve those existing dwellings and will also become part of the route for those new bus services forming part of the application.

- It will not be possible for traffic to travel into Crawley via Rusper Road as per the existing situation. Traffic will instead need to use the CWMMC and travel into Crawley via Charlwood Road/Ifield Avenue.

- The closure of Rusper Road to through traffic will require a prohibition of driving that will be made enforceable via a Traffic Regulation Order. This will entail a separate statutory legal consultation process.

128. The impact of diverting Rusper Road will have been assessed as part of the overall transport modelling work. However no modelling has been presented as part of the current application to indicate the consequences of this redistribution upon the wider highway network nor the potential increase in traffic that may occur on Rusper Road due to the development itself. This modelling will be required. It may be necessary for the Applicant to deliver additional mitigation on those routes where increased traffic flows are indicated. Any additional mitigation will need to be discussed and agreed with WSCC Highways.

129. The with regards to this application, this includes the Phase 1A and Phase 1B infrastructure in detail. In summary, this infrastructure accounts for the 'primary street' within Phase 1A and the Crawley Western Multi-Modal Corridor which is Phase 1B. Phase 1B also includes proposed signalised junctions onto Charlwood Road to the east and the realigned Rusper Road to the west, the works to severe Rusper Road where the proposed CWMMC is indicated to cross , and the proposed road bridge over the River Mole.

Phase 1A

130. For the purposes of these comments, WSCC Highways have reviewed those drawings and documents as detailed in Appendix 2.

131. Whilst the submitted plans include detailed matters including signing, lining, street lighting, and other street furniture, these will be reviewed and agreed with WSCC Highways as part of any future road adoption agreement. For the purposes of this planning application, WSCC are seeking only to comment on the planning principles.

132. The design principles for the primary street forming Phase 1A are set out in 3.1.5 and 3.1.6 of the proposed Design Codes document. The primary street designs are very much based upon the principles within Manual for Streets, Inclusive Mobility, and Local Transport 1/20 with segregated and separate arrangements, where possible, for pedestrians, cyclists, and vehicular traffic.

133. The primary street is indicated as being subject to a 20mph design speed. The indicated carriageway and overall highway corridor widths are significant given these roads are to accommodate buses, foot and cycle ways as well as the

swales and verges. This perception of space may then have consequences for achieving the 20mph design speed.

134. With Phase 1A specifically, the primary street is punctuated with proposed signalised and side road junctions, controlled crossings, as well as a varying horizontal alignment. In this instance, this will act to restrain vehicle speeds. For the purposes of Phase 1A, the proposed Design Code and general principles are accepted.

135. The detailed design of Phase 1A is presented the General Arrangement drawings (sheets 3, 6, 7 and 8). These show the proposed arrangements with 6.75 metre carriageway, 2.5 metre footway, 3 metre two-way segregated (from both vehicular and pedestrian traffic) cycle way that transitions to shared use at crossing points and junctions on both sides of the carriageway.

136. The scheme also includes priority for pedestrians and cyclists at most junctions with give way lines for traffic setback. At those busier junctions, priority for vehicular traffic is retained. This general approach is noted and accepted. Good practice guidance for the design of side road priority implies that carriageway geometries should be kept tight to restrict entering vehicle speeds. Kerb radii at certain side roads are indicated to be large at 8 to 11 metres and would not restrain vehicle speeds. These radii should be reduced.

137. There is also the matter as to whether give way lines are required for vehicles turning from the primary street into the side road. The priority crossings are on raised tables thereby slowing vehicles but also if pedestrians have started crossing, vehicular traffic will need to give way. It's suggested that the give way lines for turning traffic are reviewed as part of the detailed design.

138. WSCC Highways would also seek clarification as to why a signalised junction is required as shown on GA sheet 6. Notwithstanding the fact that the junction is not shown as would typically be expected for traffic signals (i.e. there are give way rather than stop lines), this junction will be within the site, subject to a 20mph design speed, and ordinarily would be expected to operate within capacity as a priority junction. Unless there are specific reasons to signalise this junction, it is recommended otherwise to replace this with a standard priority junction. If the traffic signals are to remain, WSCC would require the plan to be amended to show an appropriately designed signalised junction.

139. GA Sheet 7 and 8 show the proposed bus gate or bus only section of primary street. The signing and lining required to implement and make enforceable the Traffic Regulation Order to make this bus only will need to be agreed with WSCC as part of any highway adoption agreement. The design as shown will also need to be updated at this stage so as to give priority to either the inbound or outbound bus; presently neither have priority. Comments are made elsewhere concerning the monitoring and potential implementation of additional enforcement should this be identified as necessary.

140. Long section drawings have also been provided. For the most part, the gradients particularly for footways lie within the general guidance in Inclusive Mobility. There are though steeper gradients indicated on certain plans. These steeper gradients are shown for secondary roads within the southwest corner of

the site that appear to lie outside of Phase 1A. Confirmation would be sought from the Applicant that these secondary street designs are not for consideration as part of the current planning application.

141. For both Phase 1A and 1B, the Applicant should note that WSCC do not adopt or maintain bus shelters. The Applicant should clearly detail how these are to be maintained once installed.

142. The Phase 1A infrastructure has been the subject of a Stage One Road Safety Audit in accordance with WSCC Policy. There are several actions that the Applicant should undertake with regards to the Stage One RSA.

143. Firstly, the RSA raises a number of problems, a number of which have been disagreed with by the Design team. Based on the details of the problem identified and the Design team's subsequent response, it appears that some of these problems are based on lack of understanding or information provided to the RSA team. As such, based on additional information provided by the Design team, the RSA team may withdraw the problem or revise the recommendation. WSCC would strongly advise that the Design team re-engages with the RSA team to resolve as many problems in this way.

144. Secondly, problem 1A 3.2.1 refers to the junction arrangement already referenced by WSCC. The Design team will need to revise the design of this junction. The revised arrangement will need to be the subject of review by the Stage One RSA team.

145. Lastly, WSCC will need to enter comments as 'Overseeing Organisation' as well as to include 'Agreed Actions' into the Designers Response Report. An editable version of the DRR will need to be provided to WSCC. It's suggested that the DRR is agreed between WSCC and the Applicant, with the final version then submitted for the purposes of the planning application.

Phase 1B

146. The Phase 1B infrastructure covers the design of the Crawley Western Multi-Modal Corridor (CWMMC). The current planning application is intended to deliver the middle section of a more significant route around the western side of Crawley. The design and delivery of other connecting phases of the CWMCC are separate and not covered within the current planning application. The submitted arrangement is future proofed with the design principles proposed expected to follow through into subsequent unplanned/unprogrammed phases.

147. The CWMCC is a shown as a single lane carriageway running between proposed signalised junctions between the realigned Rusper Road to the west and Charlwood Road to the east. The scheme includes separate east and west bound bus lanes along most of its length. The proposals also include 2.6-metre-wide footways as well as a 4-metre-wide two-way segregated cycle lane (that transitions to shared use around junctions and on certain sections of road) again on both sides of the carriageway within the proposed built-up area. Where the CWMCC moves beyond the urban area to the east, foot and cycle provision is indicated only on the southern side. These design principles have been established through pre-application discussions.

148. There is also a new bus stop lay-by indicated on Ifield Avenue to the immediate south of the proposed traffic signals. It's unclear if this is an entirely new bus stop or a relocated provision. The Applicant should confirm.

149. The proposed speed limit varies along the proposed road. Again, the principle of this as well as the locations where the speed limit changes have been discussed and agreed with WSCC Highways.

150. For the purposes of the design, given the varying speed limit and character areas, different design guidance/standards are applicable; Manual for Streets where the speed limit is 30mph and the local context is primarily urban in nature, and the Design Manual for Roads and Bridges where the speed limit is 40mph and where the purpose of the road is more for the movement of traffic.

151. In relation to the above, there is very little supporting design information showing how the road layout complies with the appropriate design guidance/standards in light of the changing speed limit and context. The Applicant should produce a design audit or compliance statement demonstrating what standards have been applied and how the scheme complies. Although perhaps more relevant to the 40mph/DMRB section of road given also the intention for this length of road to form part of a much more strategic route, the design audit should cover all of Phase 1B as well as other relevant infrastructure along it (i.e. proposed crossing points).

152. The Applicant must also provide design audits/compliance statements for the proposed east and west signalised junctions. WSCC are fully aware of there being Departures from Standard within the design that remain unresolved. It's not a given that WSCC will agree the Departures from Standard, with it being WSCC preference that these are designed out where possible.

153. Regarding more detailed matters, the submitted tracking drawings are noted. It's apparent that the onerous tracking for a 16.5metre HGV results in the over-running and encroachment of opposing traffic lanes in certain instances. It's accepted that 16.5 metre HGVs will not frequently need to access the development once completed; vehicles of this nature may though be common during construction. Likewise, the 11metre rigid HGV whilst less onerous, still appears to move into the nearside/straight ahead lane when turning right into side road on the north side of the carriageway (Phase 1B tracking sheet 6). Based on the land use parameter plan, the land use on the north side of the carriageway will be employment.

154. The Applicant should be aware of the separate Approval in Principle design process regarding the River Mole bridge. This process should be picked up directly with the WSCC Structures team.

155. The General Arrangement drawings also indicate proposed otter and [redacted] fencing as well as acoustic fencing along part of the proposed roads alignment. The need for and design of these features have not been reviewed by WSCC Highways and should be reviewed by other respective consultees. The Applicant will need to confirm the intentions in terms of future maintenance.

156. Based on the long section drawings, there is a very low K value at the Rusper Road north tie in as shown on Phase 1B Long Section sheet 5.

157. The crossfall indicated for the carriageway at chainage 1560.000m on Typical Cross Section Sheet 1 is extremely steep. What are the design reasons for this?

158. The design includes signalised junctions and signalised crossings, and as such the WSCC Traffic Signals team have reviewed the proposals. They have issued a number of comments. These are repeated below.

Phase 1B GA Sheet 1

159. Please provide the LinSig model created for this proposal.

160. Please provide justification for the decision to make the staggered crossing a left stagger. As previously highlighted, confusion can arise from this arrangement.

161. Please provide details of the distance between crossing points on the centre island.

162. A maintenance bay is required, near to the controller location. Please identify on the drawing where this will be.

163. The tracking movements provided, suggest some movements have minimal room for error and could result in kerb overrun and additional maintenance requirements. Please review and where possible increase turning availability to reduce this risk.

164. There are concerns relating to cyclists rejoining the carriageway, to the north of the junction, particularly where cyclists are forced to join the carriageway when facing oncoming traffic. Please review and provide justification for the abrupt ending of cycling facilities.

165. Please confirm the distance between pedestrian studs & vehicle stop lines at each crossing point.

166. Has a bus gate been considered for the westbound approach? If high volumes of traffic are experienced, any bus wishing to travel north at the junction, only has a short length of carriageway in which to move to the offside lane, which may impact queues.

Phase 1B GA Sheet 2

167. Given the closeness of each site and crossing widths stated elsewhere, please ensure during detailed design, sites are linked to efficiently manage traffic flows. For the method proposed, please ensure sightlines/distances between controller locations enable smooth operation of linking system chosen.

Phase 1B GA Sheet 3

168. Please provide the LinSig model created for this proposal.

169. Please provide justification for the decision to make the staggered crossing a left stagger. As previously highlighted, confusion can arise from this arrangement.

170. A maintenance bay is required, near to the controller location. Please identify on the drawing where this will be.

171. Please explain the rationale behind the raised tables at this junction; the previous explanation was not complete.

172. The vehicle tracking provided, indicates large vehicles may have challenges moving into/out of the side roads, if vehicles are stationary at the stop lines. Please review stop line positions to determine the most suitable position that removes conflicts.

Phase 1B GA Sheet 4

173. As previously identified, the distance between the two crossing points should adhere to section 11.17.4 of TSM Chapter 6; the current proposal seems insufficient and will cause confusion for pedestrians. Alternatively, consideration to a staggered crossing should be given.

Phase 1B GA Sheet 7

174. As previously highlighted, the WSCC Traffic Signals Team do not support the proposed layout due to safety concerns generated by lack of visibility and requirement to undertake multiple directional changes within a short space of carriageway. Full intervisibility within this junction cannot be achieved due to vegetation within land owned by others, on the southern end of the junction. Alternative arrangements should be explored into how to link these sections of carriageway using traffic signals.

175. Other concerns exist regarding this proposed layout. Until an acceptable solution can be achieved regarding the overall layout, it does not seem beneficial to currently highlight them.

176. Phase 1B has been the subject of a Stage One RSA. As per the comment made for Phase 1A, it's recommended that the Design team liaise directly with the RSA team to determine if any of the disagreed problems can be resolved through the provision of additional information or simply the Design team's explanation. Again, like Phase 1A, there are problems raised that may be quite easily resolved.

Conclusions and Further Actions

177. WSCC Highways have reviewed the submitted transport information. A number of potential issues and additional items of information have been identified that are required to be addressed. These are as set out below,

- Detailed modelling showing the traffic consequences of closing Rusper Road as proposed within the TA,
- Review and amend where necessary the Movement and Access Parameter Plan to ensure routes are continuous and consistent with the Design Code,
- Review and submit details showing how routes on the Movement and Access Parameter Plan connect into the existing highway network,

- Review the means of delivering off-site LCWIP routes,
- Prepare and submit a detailed Bus Strategy that demonstrates how the bus services are to funded,
- Identify the exact bus routing within the proposed development,
- Review and identify measures necessary within the existing highway network to support the proposed bus routes,
- Update the proposed measures on Rusper Road to ensure a consistent carriageway width in relation to the proposed bus routing,
- Update the Umbrella Travel Plan in line with WSCC comments,
- Prepare and submit a transport vision document (to include means of monitoring and remedial actions),
- Provide outputs from the Crawley Transport Model and distribution diagrams showing how development traffic distributes across the network,
- Review model outputs to ensure that these are robust and where necessary validated against the base year,
- Review, update, and provide clarification on the Design Code where necessary,
- Review and update the Construction Traffic Management Plan,
- Review and update the Phase 1A and 1B design in light of the WSCC comments (including those from the WSCC Traffic Signals team),
- Provide a detailed design audit for Phase 1B that shall include the respective junctions at the east and western most extents as well as the highway infrastructure proposed along it,
- Resubmit the Departures from Standard to WSCC and enter into discussion with WSCC to seek to resolve these,
- Provide additional information to and engage with the Stage One RSA team to determine what problems remain outstanding.

178. WSCC Highways will provide further comments as additional information is made available.

Ian Gledhill
West Sussex County Council – Planning Services

Appendices

Appendix 1 – Relevant Planning Policy

National Planning Policy Framework extract

Considering development proposals

115. *In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
   a) *sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
   b) *safe and suitable access to the site can be achieved for all users;*
   c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code48; and*
   d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.*

116. *Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.*

117. *Within this context, applications for development should:*
   a) *give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
   b) *address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
   c) *create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
   d) *allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
   e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

118. *All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.*

Draft Horsham Local Plan 2023-2040 Regulation 19 extract – West of Ifield transport requirements

A comprehensive transport strategy is submitted as part of the masterplan with development to include the following:

a) A walking and cycling strategy that demonstrates how attractive, direct and legible routes that have priority over motorised traffic, and integrated with the existing and wider network will be delivered and maintained;

b) A multi-modal route with segregated Fastway bus lanes connecting Charlwood Road to the north with Rusper Road to the south (with southern access limited to public transport and emergency and non-motorised vehicles);

c) Extensions to the Crawley Fastway bus rapid transit network to enable fast connections to (as a minimum) Crawley Town Centre and Manor Royal Business District, and provide convenient bus access to key destinations within Horsham District;

d) Demonstrate how electric vehicle use for private car travel and, as far as possible, for public transport are embedded in the strategy from the first phases of development; and

e) A comprehensive Travel Plan and Construction Travel Plan to be agreed by the Council and Local Highway Authority is submitted, to cover the entire construction period, which demonstrate the long-term embedment of the transport strategy.

No development shall occur within a safeguarded area of search as shown on the Policies Map that may prejudice a full Crawley Western multi-modal corridor from the A264 near Faygate to the A23 south of Gatwick, north of County Oak.

Appendix 2 – Drawings and Documents Reviewed
Transport Assessment, WOI-HPA-DOC-TA-01, dated July 2025

Phase 1 Construction Traffic Management Plan, 10051123-ARC-XXX-ZZ-TR-TP-0001, dated July 2025

Umbrella Travel Plan, WOI-HPA-DOC-FTP-01, dated July 2025

Design Code, WOI-HPA-DOC-SWDC-01, dated July 2025

Infrastructure Delivery Plan, WOI-HPA-DOC-IDP-01, dated July 2025

Stage 1 Road Safety Audit, 100511123-ARC-XXX-1A-TR-HE-0001, November 2024

Stage 1 Road Safety Audit, 100511123-ARC-XXX-1B-TR-HE-0002, December 2024

Stage 1 Road Safety Audit Designers Responses Report, Stage 1 Road Safety Audit, 10053900-ARC-HRR-ZZZ-TS-HE-00011, dated 09/04/2025

Parameter Plan 2 – Movement and Access, WOI-HPA-PLAN-PP02-01 revision P02, dated 22nd May 2025

Phase 1A Highway General Arrangement Overview, 10051123-ARC-070-1A-DR-CE-0001, revision P07

Phase 1A General Arrangement, sheets 3,6,7 and 8, 10051123-ARC-070-1A-DR-CE-00004, all revision P07

Phase 1B General Arrangement, sheets 1-7, 10051123-ARC-010-1B-DR-HE-00004, all revision P05

Phase 1A Highway Carriageway Long Sections, sheets 1-4, 10051123-ARC-071-1A-DR-CE-0001, 0002, 0003, 0004 all revision P04

Phase 1B Highway Long Sections, sheets 1-6, 10051123-ARC-071-1B-DR-CE-0001, 0002, 0003, 0004, 0005, 0006 all revision P05

Phase 1B Typical Cross Section, sheets 1 and 2, 10051123-ARC-072-1B-DR-HE-00201 and 00202 revision both P03

Phase 1B Highway Swept Path Analysis sheets 1-8, 10051123-ARC-070-1B-DR-HE-00011 all revision P01

Vehicle Tracking Paths, sheet 1 and 2, 10051123-ARC-070-1A-DR-CE00018 and 0019, both revision P02