

**Sent:** [REDACTED] 17 September 2025 19:58  
**To:** [REDACTED] Planning  
**Subject:** [REDACTED] Planning Application aObjection DC/25/1312 – Land West of Ifield (Homes England)  
**Categories:** Comments Received

Dear Sir/Madam,

I write to object to the above application on transport and highways grounds. The applicant's Transport Assessment and Construction Traffic Management Plan contain significant weaknesses and rely on assumptions that are not secured. On their own evidence, the residual cumulative transport impact is likely to be severe, and the mitigation package fails the statutory tests of necessity, precision, and enforceability.

## 1. Reliance on Optimistic Travel Mode Share Assumptions

- The Transport Assessment assumes external mode shares for all land uses as follows: Train 6 per cent, Bus 20 per cent, Car driver 36 per cent, Car passenger 20 per cent, Cycle 10 per cent, Walk 8 per cent.
- This produces approximately 2,515 two-way external person trips in the morning peak and 3,583 in the evening peak. Of these, car drivers are predicted to be 939 (morning) and 1,351 (evening); bus riders 573 (morning) and 765 (evening).
- However, the assumed 20 per cent bus share is dependent on entirely new or enhanced services. These are supported only by "monitor and manage" mechanisms within Section 106 obligations, with no binding agreements with operators, no fixed headways, and no secured duration of service.

### Sensitivity Re-Modelling

If the bus share fell by eight percentage points (from 20 per cent to 12 per cent) and all those trips were instead made by car drivers:

- Morning peak: An additional ~201 car trips, raising car drivers from 939 to approximately 1,140 (a 21 per cent increase).
- Evening peak: An additional ~287 car trips, raising car drivers from 1,351 to approximately 1,638 (a 21 per cent increase).

Given that Ifield Avenue junctions are already modelled at or over capacity (see Section 2), these additional trips would tip the network into serious congestion even with mitigation.

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Objection: The Transport Assessment’s results are only “acceptable” under a best-case, unsecured mode share scenario. This does not meet the requirement for robust assessment under National Planning Policy Framework paragraph 116.

## 2. Junction Capacity Failures – Deferred Solutions

- Ifield Avenue and Warren Drive: The 2041 scenario shows a ratio of flow to capacity greater than 1.0 without works (over capacity). Signalisation is proposed, but post-mitigation still hovers near the threshold, with a degree of saturation around 85 per cent.
- Ifield Avenue and Stagelands: The baseline already shows ratios of flow to capacity up to 1.83 in the morning. With development, these remain above 1.5. The applicant proposes monitoring and possible mitigation later, but no fixed design or trigger.

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Objection: These junctions are acknowledged to be congested now and in the future. Yet the works are not secured as pre-occupation triggers, but left to “Decide and Provide” approaches. This deferral fails National Planning Policy Framework paragraph 58 and Community Infrastructure Levy Regulation 122, as mitigation is not precise, enforceable, or certain.

## 3. Crawley Western Multi-Modal Corridor – Unproven Benefits

- Only the central section of the Crawley Western Multi-Modal Corridor is delivered early, in Phase 2.
- The Crawley Transport Study noted “mixed results” for the scheme, with some local relief but little network-wide benefit.
- Early phases therefore rely on Ifield Avenue corridor, which is already over capacity.

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Objection: The corridor’s partial delivery and uncertain benefits mean the Transport Assessment overstates its mitigating effect. Occupation should be capped until the full corridor is open and functioning – otherwise residual impacts remain severe.

## 4. Construction Traffic – Under-Assessment

- The Construction Traffic Management Plan estimates 23,057 two-way trips during Phase 1 construction, approximately 72 per cent of them heavy goods vehicles (about 16,600 one-way

heavy goods vehicle trips). This equates to an average of 28 trips per day (about three heavy goods vehicles per hour at peak construction).

- The methodology is inconsistent: the Construction Traffic Management Plan inflates the Trip Rate Information Computer System key performance indicator for construction cost, but the Transport Assessment does not.
- Worker trips are acknowledged but not quantified, despite reliance on residential roads such as Ifield Drive and Rusper Road for access.

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Objection: The modelling likely underestimates construction traffic, particularly private car trips by workers. Without binding heavy goods vehicle caps, routing and delivery-hour controls, safety and air quality risks to residential areas are unacceptable (National Planning Policy Framework paragraphs 96(b) and 186).

## 5. Walking and Cycling – Gaps Between Aspirations and Reality

- The mode share assumes 18 per cent of trips by walking or cycling.
- Yet the Transport Assessment itself admits to narrow and unlit pavements and missing Local Cycling and Walking Infrastructure Plan links.
- Delivery of upgrades is deferred to future Section 106 “reviewable” measures.

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Objection: Without guaranteed early delivery of safe walking and cycling routes, the assumed mode shares are unrealistic, inflating the sustainability case.

## 6. “Decide and Provide” Approach – Legally Unsound

- The Transport Assessment repeatedly relies on “monitor and manage” with later draw-down of funds if monitoring shows impacts.
- But this defers core mitigation such as junction signalisation and bus funding into the future.
- Case law (No Adastral New Town v Suffolk Coastal District Council [2015]) requires mitigation to be certain at consent.

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Objection: Key works and services are not certain, precise, or enforceable – contrary to National Planning Policy Framework paragraph 58 and Community Infrastructure Levy Regulation 122.

## Conclusion

- On the applicant’s own modelling, junctions are over capacity without mitigation.
- Mitigation relies on optimistic mode shares and deferred works.

- A modest fall in bus uptake (minus 8 percentage points) adds 200–300 peak car trips, which the corridor cannot absorb.
- Construction traffic is under-assessed and under-controlled.
- Walking and cycling infrastructure is aspirational, not secured.

Accordingly, the scheme fails National Planning Policy Framework paragraph 116 (severe residual cumulative impacts), National Planning Policy Framework paragraph 58 (mitigation precision), and Community Infrastructure Levy Regulation 122 (necessity, direct relation, proportionality). The transport case is not robust, and permission must be refused unless these flaws are resolved.

Yours faithfully,



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