

[REDACTED]  
108 Heath Way

Horsham

West Sussex

RH12 5XS

18/05/25

DC/25/0629 – Residential development comprising approximately 206 dwellings, including the conversion of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of existing cedar trees at the site.

Dear Sir/Madam,

I am writing concerning the above application, DC/25/0629 (Lovell Site which backs on to Wimblehurst Road, Horsham). My formal response is centred upon numerous outstanding serious transport issues that the application has failed to address properly in the presented documentation. My representation is an informed professional judgement from someone with many years of local authority transport planning development management experience.

My representations centre around the following documents: Transport Assessment, Travel Plan and the submitted site plans.

In the current state, the application requires substantial further work and as such I object to it.

## **1. Vision led transport planning**

Any major development, particularly residential, should have a clear vision for transport, demonstrating how the site will mitigate the transport impact on the existing transport and highway network. It should demonstrate how it will mitigate impact also on the local community and encourage active, sustainable transport. Any development should also consider the cumulative impact of development on local transport infrastructure. In this case, the Lovell site should also consider the impact of the adjoining Muse Site proposal (on the Novartis site) for 244 new homes (DC/25/0415) and also the north Horsham Mowbray site which is being developed and is less than 2 miles from the development site. This is particularly pertinent in respect of highways capacity analysis.

Unfortunately, in its current guise, the supporting transport documentation does not promote a vision led transport planning approach in respect of the submitted Transport Assessment and Travel Plan and mitigation measures proposed. These shall now be examined. Additionally, there appears to be no evidence of any Servicing and Delivery Management Plan, Construction Management Plan and Construction Logistics Plan. All of which should be submitted in draft form asap and secured via way of planning condition prior to works commencing.

## **2. Transport Assessment**

The Transport Assessment prepared by Paul Basham Associates Ltd for Lovell Partnerships Ltd requires substantial re-working to make it acceptable from a transport planning/policy perspective.

### **(a) Existing Conditions**

Section 3, Existing Conditions is inaccurate. Paragraph 3.2, Table 1 Local Amenities and Facilities, has overlooked the existence of shops at the Coltsfoot Drive shopping parade (supermarket, post office, hairdressers and dentists) yet it recognises the existence of the pharmacy!

Paragraph 3.8-3.20 Pedestrian network, the applicant has not provided a PERS audit (Pedestrian Environment Review System), which seeks to assess thoroughly the walking/public realm in and around a proposed development site. It is used as a tool to help inform priorities for improvement.

Paragraph 3.9 is inaccurate stating that Metrobus 71 and 200 services are the only bus services to pass the site. Metrobus route 61 also passes the site in the direction of the town centre.

Paragraph 3.13 states that routes to local bus stops (undefined) and the train station/town centre have been reviewed. No mention has been given as to how this was undertaken and it is unclear if the assessment was for Horsham or Littlehaven station or both. Additionally, in paragraph 3.13 the applicant noted the lack of tactile paving at a number of junctions but has failed to comment about the presence of tactile paving and condition at surrounding junctions of the site. It has also overlooked to comment/assess the existence of pedestrian wayfinding on any of the routes to/from local amenities.

Paragraphs 3.21-3.29 address the cycle network in and around the site. No assessment has been provided of any short-stay community cycle parking facilities at local amenities in the area and typical occupancy levels.

Paragraphs 3.30-3.38 examines local public transport services. Specifically relating to local bus services, paragraph 3.32 summarises services from the nearby Blenheim Road stops. This should be presented in a table, indicating frequencies on weekdays and at weekends.

In addressing local bus services, the applicant has failed to provide any commentary as to pre-existing available bus capacity and the ability of services to accommodate additional demand from the development site.

Paragraph 3.34 notes that a S106 contribution (£10,000) to provide real time information was proposed with the outline application. This should still be required and a further contribution sought to facilitate greater use of electric/hybrid vehicles.

Paragraphs 3.35-3.38 address rail services. Paragraph 3.37 states that Horsham is served by Southern Railway. It is served by Thameslink Railway also. It has overlooked that Littlehaven station is served by predominantly Thameslink services and a few early morning, peak and late evening Southern Railway services. The station has 6 cycle parking spaces.

Paragraph 3.38 summarises railway services from Horsham station. It is inaccurate stating that Southampton can be reached directly in 1 hour 32 minutes (it requires a change at Barnham) and Portsmouth in 1 hour. It overlooks Thameslink destinations that can be reached directly, such as London Blackfriars, St Pancras International, Stevenage and Peterborough. Littlehaven station is totally disregarded. Similarly to local bus services, the applicant should provide a table summarising weekday and weekend services and frequencies at both Horsham and Littlehaven stations.

Paragraph 3.39 discusses existing Car Share/Car Clubs. A map of the pre-existing car club bays should be provided, detailing operator and whether or not they are electric vehicles.

Paragraphs 3.40-3.45 outlines personal injury accident data. No comment has been made in analysing the data as to whether or not there were any mitigating factors in the accidents, e.g. weather issues etc.

## **(b) Proposed development**

Paragraph 4.1 presents the proposed development. Table 2 outlines the accommodation schedule. Within this, there is no mention is given of the number of dwellings which will be wheelchair accessible.

Paragraphs 4.2-4.8 outline proposed car parking provision. West Sussex County Council Guidance on Parking in New Developments (2020) states a requirement for 249 parking spaces but the applicant is providing 252 spaces. No justification has been given for the increased parking provision. This is contrary to vision led transport planning philosophies which promote sustainable active travel choices.

Throughout the car parking provision analysis no attention has been given to disabled residential parking provision and that for disabled visitors visiting the site. It is unclear as to how many dwellings will be wheelchair accessible.

Paragraph 4.5 states that over 50% of parking on the site will be unallocated allowing for visitor parking. No specific figure as to the designated and unallocated parking space ratios has been provided. A Car Parking Management Plan should be provided which outlines how allocated and unallocated parking spaces will be managed and any measures in place to ensure no overspill in to local residential areas. No mention has been made as to whether or not the allocated parking spaces will be chargeable. A parking stress survey to the Lambeth Methodology should be provided by the applicant to assess neighbouring parking stress conditions. This should be undertaken on neutral days, mid-week and outside of school holidays.

Paragraph 4.6 states that 2 car club bays are proposed within the vicinity of the site, once phase 3 (Muse Site) is operational. It is unacceptable that no car club bays are being provided associated with this development to promote less car dependency. A minimum of 2 years car club membership should be offered to all residents (paid by the developer) in return for not owning a car on site or parking nearby off site.

Paragraph 4.7 gives measurements of parking bays. No mention has been made of parking dimensions of wheelchair accessible/disabled parking bays.

Paragraph 4.8 states that active and passive electric vehicle charging provision will be offered. A table summarising the number and types should be provided and a plan of location of bays on the site.

Paragraphs 4.9-4.12 address cycle parking. The applicant is proposing 220 cycle parking spaces across the site in a mix of cycles stores for the flats and self contained cycle parking for houses, on the walls or fences. WSCC cycle parking requirements were for the provision of 170 spaces.

Paragraph 4.9, Table 4 mentions 206 spaces, yet paragraph 4.11, 220 spaces are to be provided. Clarity is required as to the exact number of cycle parking spaces to be provided.

The applicant has not given details as to the number of wheelchair/easy access cycle parking spaces to be provided and also the provision of cargo bike spaces. An absolute minimum of 20% of all long stay cycle parking spaces should be to Sheffield stand specification to promote ease of access and sustainable, active travel choices. No details have been given as to the security and weatherproofing to be provided for cycle parking facilities. Details of short-stay cycle parking have not been provided. Additionally, no details have been given as to any provision for e-bikes, scooters and if any cycle hire scheme is to be provided.

A summary table of short, long-stay cycle parking to be provided and detailed locations should be provided within the Transport Assessment.

Paragraph 4.13-4.15 outline the internal road layout. No mention has been given as to the location of tactile paving and other measures to support pedestrians and cyclists passing through the site. Furthermore, no mention has been given to crossing points within the site.

Paragraphs 4.16-4.17 discuss operation of the basement car park for the flats. The use of signals to control access to/from the car park is proposed. Details of how this would be managed in the event of signal failure should be provided. It is also unclear as to whether or not pedestrians are required to walk up/down to/from the car park, adjacent to the cars entering/exiting the car park or a separate pedestrian entrance/exit is to be provided.

Paragraphs 4.18-4.22 outline servicing proposals for the site. It is noted that on-street servicing will be possible from the road side (within 25m of the bin storage presentation point). A detailed Servicing and Delivery Management Plan should be provided. This should be secured by way of a planning condition. A draft Servicing and Delivery Management Plan should be provided prior to planning permission being granted and a full plan provided prior to commencement of operations on the site.

Section 5 addresses trip generation. Paragraphs 5.2-5.7 notes that consented trip generation for 300 residential units proposed 107 two-way vehicle trips in the AM peak and 97 in the PM peak. This contrasts with 98 vehicle movements in the AM peak and 86 vehicle movements in the PM peak noted in paragraphs (5.8-5.14). To say that there are less vehicular trip generation than the consented scheme (-17 – Table 18 consented v proposed) is correct. However, this is totally disingenuous, as layered on top of the Muse Site – phase 3, vehicular trip generation would be higher than originally consented scheme of 300 dwellings.

Vehicular trip generation should be considered site wide, i.e. for both phases 1 and 2 (Lovell Site) and phase 3 (Muse site) to truthfully demonstrate the site wide vehicular trip generation impact. This should equally apply to multimodal trip generation.

Paragraphs 5.17-5.18 address multi-modal trip generation. Similar to the vehicular trip generation, it is disingenuous in that it does not provide a site wide trip generation (i.e. include phase 3 – Muse Site). It is suggested that the proposed Lovell Site development will generate 266 pedestrian, 50 cycle and 75 public transport movements over a 12-hour period. The AM and PM peak period figures for cycle and public transport trip generation would appear to be somewhat artificially low (single figure digits for both). This is somewhat implausible given the nature of the residential site, being targeted at working families/people and given that there are high frequency bus stops nearby, local railway stations within a short walking distance/bus journey. Therefore, it is recommended that an appropriate uplift or higher initial trip generation figure is utilised. As it stands, the forecast multimodal trip generation, does not show a sustainable/active travel philosophy to the new development.

Section 6 addresses trip distribution in paragraphs 6.1-6.5. The most serious shortcoming is the failure of the applicant to utilise 2021 'Travel to Work' Census Data for Horsham. 2021 Census data should be used given that it is available. To say that 2011 Census data was used given that it was acceptable for the previously consented application is wholly unacceptable. The trip distribution analysis must be updated using 2021 Census data as a matter of urgency.

The trip distribution analysis contained in paragraph 6.3, Table 10 by using 2011 Census data is inaccurate in that it fails to take account of local new trip generators such as the Bohunt Academy on the new Mowbray North Horsham development and the impact of Covid and trend to hybrid working. Therefore, it could be reasonably expected that the route assignment percentage of trips in the direction of North Heath Lane would be somewhat higher than 44%.

Paragraph 6.4, Table 11 states that 0% of traffic would use a route assignment of transiting West Parade. This is implausible as there would likely to be some vehicular traffic to/from the site to the local Greenway Primary School.

Section 7 outlines access arrangements. Paragraphs 7.1-7.5 outline existing access but fail to mention a lack of tactile paving in the vicinity of the site and only an uncontrolled crossing point near the site at the roundabout of Wimblehurst Road, Parsonage Road and North Heath Lane. Given the heavily trafficked nature of the Wimblehurst Road, Parsonage Road, North Heath Lane roundabout area, this represents a potential road safety challenge for pedestrians, particularly at peak periods.

Paragraph 7.9 notes that a Stage 1 Road Safety Audit highlighted that restricted visibility could lead to increased vehicle to pedestrian collisions. Appropriate mitigation measures should be clearly outlined.

Section 8 presents junction capacity modelling (paragraphs 8.1-8.51). Similarly to the trip generation for the application site, this has been disingenuous in that it has only considered phases 1 and 2, Lovell Site and not included phase 3 Muse Site. By doing this, it does not fully appraise the highways impact of the whole site. This is a serious shortcoming that needs to be rectified. Furthermore, the failure of the applicant not to consider nearby pre-existing/future development on the highway network capacity is again a serious shortcoming. For this development, consideration should be given to the ongoing Mowbray North Horsham estate development.

Paragraph 8.4, states that the previously approved outline planning application (DC/18/2687) junction modelling has not been re-modelled for this application. Primarily this includes: Junction A – B2237/A24, Junction D – North Heath Lane/Pondtail Road/Giblets Way, Junction E – Rusper Road/Giblets

Way/Meadow Farm Lane/Lemmington Way, Junction F – Rusper Road/A264 and Junction I – Phase 3 Site Access. At a high level, failure to re-consider the traffic modelling concerning these junctions is an oversight since the impact of the nearby North Horsham Mowbray development and Phase 3 Muse Site needs to be considered on these junctions.

Paragraph 8.6 Junction A – B2237/A24 Roundabout states due to the signalisation of the junction, that there is a significant increase in capacity. The magnitude of capacity should be detailed. Furthermore consideration needs to be given to the Phase 3 Muse Site and Mowbray Estate traffic that would be using the junction and whether or not capacity constraints would be created by this.

To state that the proposed vehicle flows of 21 in the AM peak and 18 in the PM peak are below the WSCC threshold for junction modelling maybe factually correct. However, what is not, is the site wide (phases 1,2 and 3) combined traffic generation through the junction. This would undoubtedly be above the 30 trip threshold stated by WSCC. Therefore, the applicant should be required to undertake the necessary junction modelling.

Paragraph 8.8 Junction D – North Heath Lane/Pondtail Road/Giblets Way states that the previous junction assessment revealed that the proposed development will result in a reduction of vehicle trips through the junction. This is not a plausible assumption, given that this junction is a key access point for traffic from the site accessing the A264 Horsham Northern Bypass. Furthermore, the impact of the Mowbray development on the junction has not been considered alongside the whole site impact of the development (phases 1,2 and 3).

Paragraph 8.9 – Junction E – Rusper Road/Giblets Way/Meadow Farm Lane/Lemmington Way notes that in the previous assessment that a slight increase in traffic would be experienced. Despite this, the junction would operate within capacity. Again, the applicant needs to consider the site wide vehicular traffic generation and associated Mowbray site traffic.

Paragraph 8.11 examines Junction F-Rusper Road/A264 roundabout. The previous assessment deemed the junction operating at over capacity. However, to cater for the Mowbray development, improvements to the junction have been made. Irrespective of this, the applicant should model the impact of the Mowbray development and the whole site wide development (phases 1,2 and 3) to demonstrate that there would still be available capacity.

Paragraph 8.13 states that Junction I – Site 3 access on Parsonage Road was not part of this assessment as it is being considered in another planning application. This is unacceptable, given that both the Lovell Site (Phases 1 and 2) and Muse Site (Phase 3) traffic impact needs to be considered jointly and with the Mowbray Estate impact to ascertain a true traffic impact.

Paragraphs 8.14-8.15 examine the scope of junctions modelled. One junction that appears to have been overlooked is the Richmond Road – Wimblehurst Road junction, particularly in relation to accessing Wimblehurst Road from Richmond Road which requires a right turn across oncoming traffic. This is the main thoroughfare from Horsham station, Horsham Hospital and a route from the town centre. At present, this junction can be a bottleneck, at all times. This junction will further suffer by increased traffic accessing the development site.

Equally, the junction of Blenheim Road – North Heath Lane appears to have been overlooked. This is of particular concern for vehicles trying to exit Blenheim Road (and from the closes off Blenheim Road) in the direction of the North Heath Lane-Parsonage Road-Wimblehurst Road roundabout. At present, this can be a time consuming movement in the AM peak. With the additional traffic from the Lovell and Muse Site developments heading along North Heath Lane, this will worsen egress from Blenheim Road in the AM peak particularly.

Paragraphs 8.18-8.19 discuss the baseline traffic flows. There are a number of methodological concerns. Firstly, by only undertaking 1 set of junction turning counts on the 27/11/24 this is not a truly representative account of the situation. A minimum of 3 days worth of counts should have been undertaken to obtain an average and allow for any possible mitigating factors, such as weather. Furthermore, for the AM and PM

peaks the survey times vary at differing survey locations. For consistency purposes surveys should have been conducted at the same times across all survey sites.

Paragraph 8.21 discusses committed development. This needs to be updated to reflect that the Phase 3 Muse Site development has been submitted.

Paragraphs 8.22-8.51 discusses site access junction modelling. The site access having been modelled for 2031 future year + Committed Development + Proposed Development scenario, appears to have overlooked the impact of the 2 sites plus traffic generated from the nearby Mowbray Estate development which by 2031 would be fully operational. This needs to be considered to ascertain a more realistic picture of the highway network.

Paragraphs 8.24-8.32 consider the Parsonage Road/Wimblehurst Road/North Heath Lane roundabout. Specifically, paragraph 8.26, Figure 10, notes that pre-existing (2025) queue lengths on North Heath Lane in the AM peak (07:45-08:45) are typically 106.97 seconds rising to a 2031 future year with the Lovell and Muse Sites of 245.71 seconds. This is quite clearly, a wholly unacceptable situation. The future year (2031) figure needs to also consider traffic generated from the Mowbray Estate development. An appropriate highways mitigation measure needs to be proposed with an appropriate s106 or CIL contribution secured from the developer of the Lovell and Muse site development. It should be noted also, that the present AM peak hour congestion on North Heath Lane and future projections will also have a serious knock on impact on local bus services, particularly the route 200 Gatwick Airport-Horsham bus station via North Heath Lane. If the congestion is allowed to worsen, there could be a possibility that this route is re-routed in the AM peak away from North Heath Lane for punctuality reasons.

The AM peak junction analysis, of 07:45-08:45 should have really been extended to 09:15 and started back at 07:15 to fully capture commuter traffic and school traffic from North Heath Lane.

Paragraphs 8.33-8.44 examine the Wimblehurst Road/B2237/West Parade Signalised Junction. 2025 junction analysis demonstrates that the junction operates at over capacity and this situation is exacerbated by the proposed development (phases 1 and 2 and 3). Paragraph 8.41 suggests mitigation in the form of signal cycle changes which improves junction delays (albeit still with the junction operating at over capacity). To fully mitigate the impact of both Lovell Site and Muse Site, the developer should be expected to make a sizeable contribution (s106 or CIL) to improvements at this junction. The junction analysis should for the future year scenario (2031) take into consideration traffic generation from the Mowbray Estate development. Additionally, any signal changes at the junction will need to provide modelling to show the wider highways impact on nearby junctions.

Paragraphs 8.45-8.47 examine the Parsonage Road/Parsonage Way/Foundry Lane Roundabout. Although, in all scenarios, it appears that the roundabout operates within capacity, it is unclear from the 2031 future year scenario, whether or not traffic from the Mowbray Estate development has been factored in.

Paragraphs 8.48-8.51 examine the Parsonage Road/Rusper Road/Crawley Road/Redkiln Way/Kings Road Roundabout. Although, in all scenarios, it appears that the roundabout operates generally within capacity, it is unclear from the 2031 future year scenario, whether or not traffic from the Mowbray Estate development has been factored in.

Section 9 addresses off-site highways works and contributions. Paragraphs 9.1-9.4 examine pedestrian infrastructure. The applicant notes that around the site numerous junctions do not have tactile paving and as such the developer would be prepared to contribute towards this. Given the increased footfall on Wimblehurst Road/North Heath Lane, the developer should be required (by way of s278 highways agreement) make a contribution towards upgrading/repair footways on Wimblehurst Road/North Heath Lane/Parsonage Road and on Richmond Road.

Paragraph 9.5 discusses required cycle contributions. The applicant states that it would prefer to use the £100,000 s106 contribution set aside in the outline application for cycle improvements on something physical rather than cycle signage and Traffic Regulation Orders. The applicant should provide details as

to what it would propose to deliver to enhance modal shift. Consideration should also be given as to development of a cycle hire facility for the development.

Paragraph 9.6 discusses public transport contributions. It states that the outline application proposed a £10,000 s106 contribution for improving bus stops on North Heath Lane. Given the scale of the development, this is a rather limited contribution for a development that is meant to be sustainable and encourage modal shift. The developer should be required to make a s106 contribution to the following: (a) providing pedestrian wayfinding to Horsham and Littlehaven railway stations, (b) a contribution towards increasing the Route 200 from Gatwick Airport-Horsham to half hourly on weekdays and Saturday evenings (subject to appropriate demand and for a trial period of 1 year), (c) provision of additional secure/weatherproof cycle parking at Littlehaven station, (d) consideration of routing of some bus services into the Lovell/Muse Site once all 3 phases are in operation and (e) the developer to make a contribution for a minimum of 2 years from first occupation by new residents of an annual bus/rail card in return for not taking up a parking space.

Paragraphs 9.7-9.9 examines junction capacity mitigation and improvements. The applicant needs to demonstrate a specific s106 contribution to address the Wimblehurst Road/Parsonage Road/North Heath Lane roundabout. This junction needs to be addressed prior to the development becoming operational. It is a serious pinch point that needs immediate action. A mitigation of simply traffic monitoring is sub-standard as the traffic congestion with the Mowbray development, Lovell and Muse Sites will severely impact upon congestion and air quality on North Heath Lane.

### **(c) Transport Assessment Appendices**

The Site Block Plan – Lovell Site shows what appears to be 10 disabled parking bays. Nowhere within the Transport Assessment has there been any discussion of the number of wheelchair accessible residential units to be provided and whether or not any of these 10 disabled parking bays can be used for disabled visitors to the site.

The Heritage Building C14 and Apartments Block C11, C12, C13, C15 – Basement Floor Plan currently proposes 2 disabled parking spaces which are in sub-optimum locations in that they are not adjacent to the main lobby with a lift. These should be-relocated to improve accessibility for disabled persons. The plan also fails to show whether or not any electric vehicle charging points will be provided at basement level and if any motorbike parking is provided at this level. Clarity is also sought whether or not it is proposed to accommodate any cycles at basement level.

## **3. Travel Plan**

The Travel Plan prepared by Paul Basham Associates has a number of shortcomings that need to be resolved.

Paragraph 3.4, Table 1 specifies local facilities. This is inaccurate in that it fails to highlight the existence of all the facilities at the Coltsfoot Drive shopping parade – overlooked the existence of a supermarket and post office (Budgens), dentist and hairdressers which will be traffic generators for the development site. It has also overlooked the existence of the North Heath Primary School.

Paragraphs 3.21-3.29 examine the cycling network in the vicinity of the development site. The applicant has failed to provide any details of community cycle parking facilities, e.g. at Coltsfoot Drive shops.

Paragraphs 3.30-3.39 discuss the existing public transport network. Paragraph 3.33 states that there are multiple bus services operating from Horsham bus station across West Sussex. A summary table of such services should be provided.

Paragraphs 3.36-3.39 discuss the rail network. Paragraph 3.37 is incorrect in stating that Metrobus route 71 provides a frequent service to Horsham railway station. Metrobus Route 200 provides a broadly half hourly frequency supplemented by Metrobus Routes 61 and 71.

Paragraph 3.38 states that Horsham railway station is served by Southern Railway which is not totally correct as Thameslink serve the station also.

Paragraph 3.39 fails to mention that Horsham railway station is served by Thameslink services to London Bridge, Blackfriars, St Pancras, Stevenage and Peterborough.

There is a total disregard of rail services from Littlehaven station.

Section 4 examines the proposed development. Table 3, the accommodation schedule fails to disclose the number of wheelchair accessible dwellings.

Paragraph 4.4 states that 252 car parking spaces are to be provided versus 249 required under WSCC standards. No explanation is given for the increase and the number of disabled spaces to be provided.

Paragraph 4.5 states that no more than 50% of available parking spaces will be unallocated and thus available for visitors. No mention is given to exact figures. Equally, no mention is given as to whether residents will have to pay for allocated spaces and measures to manage the parking supply, through a Car Parking Management Plan. Finally, no consideration has been given as to whether or not during construction of phase 3 – Muse Site some parking will be reduced to allow for construction compounds. No analysis, i.e. a Parking Stress Survey has been undertaken to assess neighbouring streets stress and the potential for development related parking to be accommodated in neighbouring streets.

Paragraph 4.7 states that electric vehicle charging will be provided across the site (passive and active charging). No mention has been given as to figures for this.

Paragraphs 4.8-4.11 examine cycle parking proposals. The applicant proposes 220 cycle parking spaces versus 170 required under WSCC cycle parking standards. No details are given as to short-stay visitor cycle parking, mobility impaired/disabled cycle parking and parking for cargo bikes. Little details are given as to the design specification of proposed cycle parking. An absolute minimum of 20% of long-stay cycle parking should be to Sheffield stand design specification.

Section 5 discusses the indicative baseline and travel plan targets. Paragraph 5.4 states that 2011 Travel to Work Census data was used. This is out of date as 2021 data is available. The baseline should be updated, using 2021 data.

Table 6 outlines the baseline modal splits and the targets for year 3 and 5 of the Travel Plan. For years 3 and 5 the public transport mode share should be disaggregated by mode.

Paragraph 5.8 states that a target is to reduce peak vehicle trips by 10% by the end of the Travel Plan versus the baseline figures in the Transport Assessment. This is not strict enough, it should be a higher percentage of all vehicular trips associated with the site.

Section 6 outlines the Travel Plan Strategy (paragraphs 6.1-6.28). Paragraph 6.3 states that an aim is for a 10% modal shift. Details of the nature of the 10% modal shift should be given, i.e. which sustainable modes the shift is to.

Paragraph 6.4 outlines the preliminary travel plan package. The proposals are severely lacking in measures to encourage modal shift, solely focusing on appointing a Travel Plan Co-ordinator and producing a Resident Welcome Pack. There are no incentives proposed to switch to sustainable travel choices, e.g. (a) provision of 2 years car club membership in return for the dwelling becoming car-free, (b) providing a subsidy towards purchasing a bike in return for the dwelling going car-free, (c) providing a subsidy towards purchasing a rail card or local bus pass in return for the dwelling going car-free and (d) provision of a cycle hire facility (which could be available for both the Lovell and Muse Sites).

Paragraphs 6.5-6.28 outline the proposals for the Travel Plan for 5 years following 50% occupation of the development site. Paragraphs 6.7-6.10 discuss walking and cycling measures. The Travel Plan needs to outline more specifically what measures it will seek to develop. To encourage cycling, consideration must be given to a cycle hire and a cycle maintenance facility on the development site (to be combined with the Muse Site development). To encourage walking some physical wayfinding information should be provided on and near to the development site, e.g. Legible London style that highlights directions and travel time to local facilities.

Paragraphs 6.11-6.14 outlines public transport proposals. Paragraph 6.11 states that 2% of existing residents travel to work by bus and the development would be an ideal opportunity to promote bus travel. Paragraph 6.12 states that targeted promotions would be undertaken to promote bus usage from the site via the Blenheim Road stops. Details of proposed promotions should be outlined.

Paragraph 6.14 states that the Travel Plan Co-Ordinator will promote rail services from Horsham station and linkages to the station from Blenheim Road. Rail services should also be promoted from Littlehaven station which is accessible via the Route 200 Metrobus service.

Paragraphs 6.15-6.17 outlines car sharing measures. Paragraph 6.17 states that should car club space(s) be delivered through the Phase 3 application, these could be promoted to Phase 1 and 2. This is weak. The Travel Plan should be pressurising for car-club bay(s) to be provided for the Lovell Site development.

Paragraphs 6.18-6.19 address sustainable private vehicle use. More detailed proposals should be provided as to the proposed baseline of electric vehicle charging points on site and options for expansion on the site should demand increase. Additionally, consideration should be given to production of a traffic reduction strategy for the site (combining both the Lovell and Muse Sites).

Paragraphs 6.20-6.22 examines home/remote working and other modes. From the submitted evidence it is unclear as to the level of provision of motorcycle parking to be provided across the site. Furthermore, it is unclear as to whether or not there will be any sort of central pick-up/drop-off bays for short-term use for taxis etc.

Paragraph 6.27 examines local area and other site users. A specific requirement should be that the development site should seek to join up with any residential travel plan in situ with the Mowbray Estate development given its proximity and scale.

Paragraph 6.28 examines measures for visitors and deliveries. The Plan should outline how it intends to promote sustainable deliveries, e.g. use of cargo bikes, delivery consolidation and assisting visitors to the site in wayfinding to/from the site.

Section 7 examines implementation and monitoring of the Travel Plan. Paragraph 7.13 states that no remedial measures have been identified, should Travel Plan targets not be met. A suite of remedial measures should be specified in the Travel Plan at the outset, to give credibility and robustness of the document.

Appendix B of the Travel Plan shows local amenities and journey times for pedestrians and cyclists. Both maps are inaccurate in terms of amenities, failing to show the shop, post office, ATM and post box at the Coltsfoot Drive shops. Bus stops are not shown on North Heath Lane and in Coltsfoot Drive. On the cycling map the Holbrook GP Surgery is not shown. On both maps, Holbrook Primary School off North Heath Lane is not shown. On the cycling map, the Bowhun Academy school is not shown. All these schools are heavy traffic generators.

#### **4. Supporting plans**

There are a number of shortcomings with a number of the supporting plans as identified below.

##### **4.1 Proposed dwellings ground floor plans**

A series of proposed ground floor plans have a number of shortcomings relating to transport issues. The specific concerns are:

The ground floor plan needs to mark up the waste capacity of the refuse bins and for the cycle store the number of cycle parking spaces and the design specification. The car parking spaces should show the number being provided and whether or not electric vehicle charging is to be provided (including the type).

This applies to the following drawings:

Gatehouse C01\_3B6P Type T4\_Type T5 – GA Plans

Townhouse C03\_4B7P Type T4 - GA Plans

Townhouse C09\_3B6P Type T2 – GA Plans

Mewshouse C10\_2B3P Type T1 – GA Plans

Townhouse C22\_4B7P Type T1\_3B6P Type T3 – GA Plans

Townhouse C23\_3B6P Type T1 – GA Plans

Townhouse C24\_4B7P Type T3 – GA Plans

Gatehouse C26\_4B7P Type T1\_Type T2 – GA Plans

#### **4.2 Site Plan – Overall Lovell Site**

The Site Plan needs to clearly mark up the number of disabled parking bays and whether or not electric vehicle charging is provided (including the type). On the site plan the number and type of electric vehicle charging points should be clearly marked up. Communal cycle store facilities including quantum and design specification should be marked up.

#### **4.3 Cycle and refuse storage – dwelling house**

This plan should specify for the cycle parking the quantum, design specification, weather proofing and nature of security to be provided.

#### **4.4 Heritage building C14 and Apartment Blocks C11, C12, C13, C15 – Basement Floor Plan**

The 2 proposed disabled parking bays need to be re-located to afford direct access to the lobby and lift. Additionally, clarity is sought as to whether either of these bays and any of the other parking bays will have electric vehicle charging point capability. The type of charging capability should be specified on the plan.

The lifts shown on the plan should have dimensions provided to demonstrate that a wheelchair could easily fit in the lift car.

The plan should show the location of the proposed signal at the bottom of the ramp that controls vehicular access/egress from the basement.

The plan should also highlight whether or not any residents long stay cycle parking is to be provided in the basement, giving details of the design specification and quantum.

### **5. Unresolved issues**

As the application stands, there are several unresolved issues that need to be addressed.

#### **5.1 Parking**

As previously highlighted, a parking stress survey to the Lambeth Methodology is required to assess the parking stress in neighbouring streets. This needs to take into account the area from the site along North Heath Lane up to and including the Coltsfoot Drive shopping parade on North Heath Lane. It should include Blenheim Road and the streets adjoining it, the closes off Heath Way (both entrances) and specifically Heath Way itself. Since the Coltsfoot Drive shopping parade will be the nearest shopping parade with a post office, pharmacy and dentist to the development site, allied with its proximity to North Heath Lane Primary School, this is likely to be a significant traffic generator from the site. Heath Way between the junction with Barnsnap Close has a particular problem with shop/café/dentist/pharmacy, school related parking (some of which can be long-stay with shop workers and short-stay trades people parking on the pavement at the junction with North Heath Lane to visit the cafe). This will only worsen significantly with the development. Therefore, appropriate mitigation and enforcement will be required. Extension of pre-existing double yellow lines on both sides to the junction of Barnsnap Close would be a start. A more appropriate measure would be introduction of a Controlled Parking Zone with appropriate enforcement in Heath Way and the closes to manage the situation.

## **5.2 Construction Management Logistics Plan**

A Construction Management Plan needs to be submitted by the applicant. Of particular concern is in relation to the phasing for the Lovell Site (phases 1 and 2) and impact on the highway network and local community. Additionally, when phase 3 Muse site is delivered, how this will be managed to ensure minimum traffic impact and disruption to residents living on the Lovell Site. The applicant will need to demonstrate how they intend to minimise construction movements to/from the site e.g. through waste compaction and that it will be sensitive to the local community by avoiding peak hours and school drop-off/pick-up times for construction movements etc.

A draft Construction Management Logistics Plan should be submitted prior to planning permission being granted and a full version submitted for approval by the Local Highways Authority prior to works commencing.

## **5.3 Servicing and Delivery Management Plan**

A Servicing and Delivery Management Plan needs to be prepared by the applicant. This needs to consider the servicing and delivery requirements for the site and also how this could change with the phase 3 Muse Site. It should include envisaged trip generation for such activity and any measures to help consolidate delivery activity at the site. This should be provided prior to granting planning permission.

## **5.4 Muse Site (Phase 3) development**

A planning application for this development has been submitted before the submission of the Phases 1 and 2 Lovell Site application that this submission addresses. Throughout the application, the applicant largely tries to ignore the Muse Site application, thus attempting to underplay the highways and transport impact of the site. This is highly disingenuous and needs to be addressed by both the Local Planning and Highways Authority. The combined site total of 450 dwellings (206 Lovell and 244 Muse Site) is greater than the previously consented scheme of 300 residential dwellings. Thus, the highways and transport impact will be greater. Added to the fact that there is the nearby Mowbray Estate development, there is real concern amongst the local community that the local amenities and transport infrastructure will become log-jammed with this development. Therefore, it is strongly advised that a further Transport Assessment considering the combined Lovell and Muse site is undertaken with a more informed assessment of the Mowbray Estate development. Failure to do this, runs the risk of consenting development that will provide substantial long-term disbenefit to residents of the North Horsham area.

## **6. Conditions/contributions/agreements required**

In addition to the concerns/shortcomings raised in this submission, the following planning conditions and agreements will need to be agreed to between the applicant and Local Planning Authority and Local Highways Authority.

- (a) Prior to occupation of the site, a Construction Logistics Management Plan should be submitted for approval by the Local Highway Authority.
- (b) The applicant will be required to agree to a s278 agreement to enhance and improve footways on Wimblehurst Road, North Heath Lane and Parsonage Road given the increased footfall associated with the development.
- (c) During construction, the applicant will be required to agree to a condition prohibiting construction vehicle movements on weekdays in the AM Peak (08:00-09:00) and PM Peak (17:00-18:00). Given the close proximity of North Heath Lane Primary School, it will be required to prohibit vehicle movements at School drop-off and pick-up times (to be agreed with the school and Local Highway Authority).
- (d) The applicant will be required to agree to a condition to undertake a Lambeth Methodology parking stress survey on neighbouring streets in the vicinity of the site, including as far as the Coltsfoot Drive Shopping parade and Heath Way and closes with the view to making a contribution to appropriate traffic management measures.
- (e) Agree to s106 contributions to improve public transport infrastructure and services, subject to operator consent. Specific measures could include a contribution to extending weekday and

Saturday Metrobus Route 200 services to/from Gatwick Airport via the site to Horsham to afford a 30 minute frequency. Such measures should be negotiated with the Local Highways Authority.

- (f) Agree to a s106 contribution to improving cycle infrastructure on and in the vicinity of the site, which includes provision of additional community cycle parking at local amenities, consideration of an on-site cycle hire scheme and incentives for residents to take up cycling.
- (g) A condition requiring a Car Park Management Plan should be agreed to demonstrate how the site will be effectively managed, particularly in relation management of unallocated and allocated parking provision.
- (h) A condition requiring at least 20% of all site cycle parking to be in Sheffield stand specification should be required to promote ease of accessibility and appropriate disabled/mobility cycle parking to be provided.

## 7. Summary

The above mentioned submission provides a comprehensive resume of the current transport concerns/issues associated with the application DC/25/0629 for the Lovell Site (Phases 1 and 2). In its current state, from a transport policy and planning perspective it is not possible to recommend approval due to the numerous shortcomings. Only once have these been thoroughly addressed by the applicant can the application be re-considered. Therefore, I have no option but to lodge a formal objection to this application.

Yours faithfully,

[REDACTED]