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Via email only

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Dear Matthew

NETWORK RAIL – RESPONSE TO APPLICANT’S TECHNICAL NOTE 4

Network Rail Infrastructure Limited ("Network Rail") has reviewed the applicant's Technical Note 4 (dated 28 July 2026) submitted in response to our consultation comments dated 13 July 2026. Whilst Network Rail (NR) welcomes the applicant's continued commitment to sustainable transport measures and their willingness to provide a contribution towards cycle parking at Christ's Hospital Railway Station ('the Station'), we maintain our request for a financial contribution towards accessibility improvements at the station.

Accessibility Constraints at Christ's Hospital Station

As set out in NR's original consultation response, the Station is currently classified as a Category B3 station. Whilst Platform 2 benefits from step-free access, London-bound Platform 1 can only be reached via stepped routes. There is currently no step-free route between platforms, creating a significant accessibility constraint for passengers with reduced mobility, wheelchair users, older people, passengers travelling with luggage and those travelling with pushchairs. NR has identified accessibility improvements at the station, including provision of step-free access, as a priority intervention and estimates the cost of delivering a comprehensive scheme at approximately £6 million.

Impact of the Development

The applicant accepts that the development will result in additional use of the Station and estimates this to be approximately 30 additional users per day, equivalent to approximately 9,300 additional passenger journeys per annum. However, NR does not agree that this should be treated as a definitive assessment of future station usage.

The applicant's conclusions rely heavily on assumptions that future residents will preferentially travel to Horsham Station using enhanced bus services rather than use the Station. Whilst the proposed bus improvements are welcomed, there is no substantive evidence that future residents will consistently choose an alternative station rather than their closest local station. The existence of alternative travel options does not negate the role that the Station will continue to perform in serving future residents of the development. NR does not consider that the figure provided by the applicant represents a robust assessment of the likely long-term impact of the development.

NR is also concerned that the applicant places significant emphasis on walking distance from the centre of the development to the station. In practice, residents will access the station using a variety of modes including walking, cycling, drop-off trips and combined bus and rail journeys. Furthermore, the distance quoted represents an average from the development and does not reflect the fact that many dwellings will be located closer to the station than the site centre used within the assessment. Consequently, walking distance alone is not sufficient justification for materially reducing projected station demand.

The assessment further appears to focus on an initial estimate of daily station users rather than the cumulative impact generated throughout the lifetime of the development. Rail demand typically increases over time as communities become established, public transport connectivity improves and sustainable travel patterns mature. NR therefore considers that the applicant's estimate should be treated as a minimum demand scenario rather than a definitive upper limit on future station use

NR's assessment identified that a development of approximately 1,000 dwellings could generate at least 24,024 additional passenger journeys annually through the station, representing an increase of approximately 14.22% compared with current station usage levels. NR expressly stated that this should be treated as a minimum assessment and that actual usage could be higher.

Furthermore, usage at the Station has already experienced significant growth, with entries and exits increasing by approximately 17% between 2023/24 and 2024/25. This demonstrates an existing upward trend in demand which the proposed development will further intensify.

Need for a Contribution

The applicant's response seeks to focus on whether the increase in station use is approximately 5% or 14%. NR considers that this oversimplifies the issue. The fundamental consideration is that:

- the development will generate additional rail demand;
- existing accessibility deficiencies already exist at the station;
- future residents will rely upon the station as part of the local transport network; and
- infrastructure investment is required to ensure the station can effectively accommodate future growth whilst improving accessibility for all users.

Importantly, accessibility schemes such as step-free access are not solely intended to accommodate new passengers generated by a single development. Rather, they address an existing deficiency within the station environment whilst ensuring the station can safely and inclusively accommodate future growth from both committed and planned development. The proposed development represents one source of that future demand and should therefore contribute proportionately towards delivery of the wider scheme.

The Government's funding programmes for accessibility enhancements also place significant emphasis on securing third-party contributions towards scheme delivery. NR therefore considers it entirely reasonable that major development proposals contributing to increased passenger demand should assist in funding accessibility improvements required to support that growth.

Requested Contribution

NR continues to request a contribution of **£853,200** towards accessibility improvements at the Station. This contribution would contribute towards the delivery of:

- step-free access to London-bound Platform 1;
- enhanced accessibility between platforms; and
- associated works necessary to improve station accessibility and accommodate future passenger growth.

NR emphasises that this contribution would fund only a proportion of the wider £6 million accessibility scheme and would not represent the entirety of the cost burden. The requested contribution is therefore considered proportionate having regard to:

- the scale of the proposed development;
- the acknowledged increase in station usage arising from the development;
- the existing accessibility deficiencies at the station;
- the anticipated long-term growth in rail patronage; and
- the benefits that future residents will derive from an accessible railway station.

Regulation 122 Compliance

Network Rail considers that the requested contribution satisfies the tests contained within Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended):

Necessary to make the development acceptable in planning terms

The development will generate additional demand at a station which currently has significant accessibility constraints. The contribution would assist in mitigating the impact of that growth through delivery of accessibility improvements.

Directly related to the development

The contribution would fund improvements at the station expected to serve future residents of the development and address impacts arising from additional passenger demand generated by the scheme.

Fairly and reasonably related in scale and kind

The contribution represents only part of a wider £6 million scheme and reflects the substantial scale of the proposed development and its associated impact on the station.

Accordingly, should the Council be minded to grant planning permission, NR respectfully requests that an appropriately worded planning obligation be secured requiring a financial contribution of **£853,200 towards accessibility enhancements at Christ's Hospital Railway Station**

Yours Sincerely

Craig Hatton



Senior Town Planner
Network Rail Infrastructure Limited