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Your Ref: DC/23/1787
Our Ref: ATE/23/00688/RM
Date: 27 October 2023

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Planning & Development Division, Active Travel England

To: Horsham District Council

Application Ref: DC/23/1787

Site Address: Kilnwood Vale Development Phase 3EDEF G Crawley Road
Faygate, West Sussex

Description of development: Reserved Matters approval sought for Layout, Appearance, Landscaping, Scale and Access (in accordance with DC/15/2813) for Phase 3DEF G of the Kilnwood Vale development, comprising 280 dwellings with associated landscaping, access and parking.

Notice is hereby given that Active Travel England's formal recommendation is as follows:

- a. ~~**No Objection:** ATE has undertaken a detailed assessment of this application and is content with the submission.~~
- b. ~~**Conditional approval:** ATE recommends approval of the application, subject to the agreement and implementation of planning conditions and/or obligations as set out in this response.~~
- c. **Deferral:** ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.
- d. ~~**Refusal:** ATE recommends that the application be refused for the reasons set out in this response.~~

1.0 Background

Active Travel England welcomes the opportunity to comment on this Reserved Matters planning application for 280 dwellings, which comprise phases 3D, E, F and G of the wider Kilnwood Vale urban extension to the west of Crawley.

The application is related to the approval of matters concerning Layout, Landscaping, Appearance, and Scale in accordance with certain conditions. These conditions include compliance with parameter plans, details of layout, scale, appearance, access, and landscaping, details of access roads, footpaths, parking (vehicle and cycle), cycle storage, turning areas, landscaping, and lighting, a statement of conformity, structure, and layout of key open spaces, and details and timetabling of phasing of key open spaces.

In July 2010, a hybrid planning application was submitted to Horsham District Council (HDC) that included a masterplan for a site, and it was approved in October 2011. It consisted of outline planning permission for approximately 2,500 new homes, a neighbourhood centre, a new rail station, a pumping station, an energy centre with land for employment, schools, and associated access and amenity space.

In November 2015, a full application was submitted for residential development on the site previously identified as a potential energy centre, which was no longer required to meet the necessary energy reduction standards. Since obtaining planning permission in October 2011, more than 1,400 new homes have been granted detailed consent in Phases 1, 2, 3, and 6. These homes are either occupied or under construction. These new homes are now accompanied by major new infrastructure, such as new roads, open spaces, and pedestrian and cycle provision. In addition, a new primary school was opened in September 2019.

ATE has since commented on several reserved matters applications that have been brought forward as part of the broader Kilnwood Vale development (Reference numbers: DC/23/1314 (Phase 2 and 3), DC/23/0856 (Sub Phase 3), DC/23/1657 (Phase 5), DC/23/1675 (Pavilion Building and the park within Phase 3) and DC/23/1647 (Phase 4).

2.0 Summary

ATE considers the site to provide suitable permeability for pedestrians and cyclists. Concerns are raised regarding the Primary Street that (although noted it is outside of the red line boundary) runs past the kick-about area and crosses two Secondary Streets that are a part of this application, considering the length of the road with no apparent traffic calming measures.

ATE welcomes that the dwellings comply with the relevant building regulations in regard to wheelchair access but would welcome further detail on the street crossings of the development to ensure wheelchair access is fully provided.

Regarding cycle storage, ATE welcomes that the proposed development (noted at 4.20 in the DAS) would emphasise pedestrian, mobility impaired and cycle use over car travel. It is considered that even though what is proposed accords with the council's guidance, the small number of cycle storage spaces offered to residents in the apartments does not demonstrate this ambition.

Further detail has been requested regarding the parking strategy referred to in the DAS; considering the high number of car spaces (660) provided within this application, concerns are raised about ensuring cars do not dominate the footways and public realm.

It has not been possible to identify from the drawings submitted where the bus stops would be located, although it is noted (in the DAS) that they would be within a 5-minute walk from dwellings; further detail on the location of bus stops and the facilities provided has been requested.

ATE considers there to be an opportunity to increase the number of cycle storage spaces provided to the residents in the apartments, which would also support the development's endeavour to provide emphasis on pedestrians, impaired mobility and cyclists. Moreover, cycle parking should also be provided near the play area to allow cycling to this location.

3.0 National Policy and Guidance

These proposals have been assessed in accordance with the following national planning policy and design guidance.

The National Planning Policy Framework (NPPF) sets out how:

104. Transport issues should be considered from the earliest stages of... development proposals, so that:

c) opportunities to promote walking, cycling and public transport use are identified and pursued.

110. In assessing... specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; [and]

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 Code

112. ...applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas...;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; [and]

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;

113. 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 transport

statement or transport assessment so that the likely impacts of the proposal can be assessed.

Gear change: a bold vision for cycling and walking - the Government's cycling and walking plan for England.

This sets the Government's vision for cycling and walking to be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030. Active Travel England's responsibilities for walking also extend to "wheeling", such as the use of wheelchairs (self-propelled or powered) and mobility scooters.

Inclusive mobility: making transport accessible for passengers and pedestrians provides guidance on designing and improving the accessibility and inclusivity of public transport and pedestrian infrastructure.

Active Design (Sport England, supported by Active Travel England and the Office for Health Improvement & Disparities) sets out how the design of our environments can help people to lead more physically active and healthy lives.

4.0 Opportunities

ATE considers there to be an opportunity to increase the number of cycle storage spaces provided to the residents in the apartments, which would also support the development's endeavour to provide emphasis on pedestrians, impaired mobility and cyclists. Moreover, cycle parking should also be provided near the play area to allow the option to cycle to this location.

5.0 Areas of Concern

Internal Layout

Notwithstanding the Primary Street in question is outside of red line boundaries for this application, concerns are raised regarding the Primary Street that runs west to east immediately south of the kick about area and crosses two Secondary Street junctions as it does not appear to have any raised table in place. ATE questions whether an additional raised table is necessary noting the guidance provided in the Manual for Streets of likely faster traffic speeds. ATE would welcome further details on whether raised tables would be established.

Wheelchair Access

ATE welcomes that the internal layout of the dwellings would allow wheelchair or mobility-impaired access in accordance with Approved Document Part M of the Building Regulations (2004). ATE would welcome further details on whether the external layout provides drop kerbs on all crossings to ensure wheelchair access in accordance with the Inclusive Mobility guidance.

Cycle Storage/Parking

The Design and Access Statement (DAS) notes that cycle parking would be provided in accordance with West Sussex Council's guidance, therefore 0.5 spaces per 1 and 2-

bedroom apartments. There is a total of 30 one and two-bedroom apartments illustrated on page 18 of the DAS; as such, 15 bicycle spaces are required per the council's guidance.

ATE considers that to provide greater emphasis on cycle use as stated in DAS, noting that 660 car spaces would be provided across the application site, the apartments would benefit from additional bicycle storage spaces to at least 1 space per unit in line with LTN 1/20, as this would further provide opportunities for residents to cycle and ensure the development is not entirely car-reliant.

LTN 1/20 (Table 11-1) suggests typical minimum cycle parking capacities, which should be followed to propose cycling to the site as a viable option, allowing people to park and lock their bicycles safely. It is also recommended that at least 5% of all spaces should cater to non-standard bicycles.

ATE also recommends that cycle parking should be provided next to the play area on the site to allow children and parents to cycle to this location and securely lock their bicycles.

Car Parking Strategy

ATE considers a total of 660 parking spaces for residents, including visitor spaces, to be significant for a development of 280 dwellings. It remains unclear how on-street parking will be controlled; clarification on this would be welcomed to avoid a situation where footways become obstructed, which can typically occur from footway parking on both sides of the street as motorists attempt to maintain 3m of clearance along the centre of the road. This is neither safe for pedestrians nor pushchairs/mobility scooters, nor is it conducive to a high-quality street scene and can result in conflict within the carriageway.

Bus Stops

It has not been possible to identify from the drawings submitted the location of the bus stops. Bus stops should be located within a maximum 400m walking distance of all dwellings in the proposed new development, and the applicant will need to confirm whether appropriate crossing points or other arrangements have been provided to ensure that there is no conflict with cycle routes. Each bus stop must have the appropriate high kerbs and shelters and be large enough to accommodate the predicted number of users. Whilst these stops may be along the route agreed under the outline application, it would be beneficial if these matters could be confirmed.

6.0 Next Steps

It is requested that these recommendations be forwarded to the planning case officer in addition to the applicant and its agent. ATE would be content to review further submitted information with a view to providing a further response and recommended wording for planning conditions and obligations.