

## Rusper Parish Council



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### Via email

Councillor John Milne  
Deputy Leader and Cabinet Member for Planning and Infrastructure  
Horsham District Council  
Parkside  
Chart Way  
RH12 1RL

Councillor Catherine Howe  
Strategic Planning  
Horsham District Council  
Parkside  
Chart Way  
RH12 1RL

Dear John and Catherine

Rusper Parish councillors appreciated the opportunity to discuss the forthcoming Local Plan with you and senior planning officials on 4<sup>th</sup> September. But we were left disappointed that despite the change to a Liberal led Council, there is unlikely to be any significant change to the current draft Local Plan, and particularly disappointing is your personal support for the allocation of 3,000 new houses West of Ifield.

We heard your arguments for a getting a Plan in place as quickly as possible – to protect against speculative applications, and the risk that water neutrality requirements will be removed – and hence you argue it is not possible to revisit the Regulation 18 process. But we can't help noting that the allocation of the West of Ifield site would run completely counter to several of your pre-election manifesto pledges, namely:

- Building the right homes in the right places,
- Putting residents first, and
- Protecting our countryside and green spaces.

**We would be interested in your views on the following points, in particular the impact on Rusper of Homes England's transport proposals for West of Ifield.**

### **1. Why should Rusper parish pay the price for unsustainable housing targets?**

We learned that the new housing target is likely to be 800. **But this is NOT good news** – another 10 years of 800 houses a year will perpetuate the current rate of unsustainable population growth which is double the national rate. 800 may be a lower number than proscribed by the Standard Method due to water neutrality and removal of the DtC and buffer which could have given a target of 1,200+. But 800 new houses a year is at least double genuine local need as calculated using ONS detailed data and allowing for several hundred houses a year to help Crawley. And 800 houses a

year has been the target since 2015, which has led to unsustainable population growth of 11.8%<sup>1</sup> over the past 10 years, the highest of any local authority in Sussex or Surrey and almost double the rate for England and Wales overall (6.3%). We seem set for Horsham to continue growing at exactly the same unsustainable rate.

Rusper Parish Council know that they are disproportionately and unfairly impacted by housing development within our own border from West of Ifield, Kingsfold with the bulk of the development at K Vale and North Horsham being on our borders. This not only destroys the character of our Parish but also is detrimental to the permanent loss of our rural setting.

## **2. Homes England's transport proposals are dangerous and completely unsustainable**

There are many excellent reasons not to allocate the West of Ifield site, but we would like to draw your attention to the fact that Homes England's transport proposals are confused, aspirational, totally unsustainable, and pose significant danger to the existing road users across Rusper. Not only will the proposals create significantly **more traffic** than is assumed in the Crawley and Horsham transport modelling, but the lack of a full Western Link<sup>2</sup> Road and the reconfiguration of the Rusper Road in Ifield will **increase rat-running** through Rusper's rural roads.

For context, there are no A or B class roads in or around the Parish, only C, and all are narrow country lanes (5.2m wide or less), lack footpaths (except the junction of Charlwood Road and Ifield Avenue) and are heavily used by agricultural machinery, cyclists and equestrians. The only bus route runs along the Charlwood Road. There are several rat-runs through the parish at peak times, which can be very dangerous to residents.

### Traffic generation

**In planning terms, the peripheral location of the West of Ifield site does not allow for appropriate opportunities to promote sustainable transport modes and its development would be contrary to both the NPPF sections 106 and 110, as well as the HDPF policies 1 and 40.**

The comprehensive transport strategy for the site as set out in Horsham Local Plan Policy HA2 is ambitious, but unrealistic for several reasons, with seriously negative impacts for Rusper and Crawley. First the volumes of traffic will increase much more than suggested:

1. **The extent to which residents will walk and cycle is exaggerated.** The distances to rail and community services will be substantially further than is considered reasonable.
2. **There is a heavy reliance on bus travel to achieve trip reductions** and promise of a *"high-quality bus corridor that would be extended to serve these proposed developments [West of Ifield and West of Kilnwood Vale], linking to key destinations including Crawley Town Centre and Manor Royal, as well as improvements to cycling and walking infrastructure"*. But it will be difficult to achieve the required permeability for Fastrack bus routes, and cycleways, through the surrounding residential area and into Crawley – it's not clear how Fastway bus lanes could be accommodated at the access points to the site on the Charlwood Road and Rusper Road. Policy HA2 also refers to Fastway extensions to key destinations in Horsham District but no detail of type, routes and frequency, has been provided, or whether upgrades to Rusper's rural roads will be made to facilitate the use by buses.
3. **The supposed proximity to rail services is greatly exaggerated.** Ifield Station:
  - Is not conveniently located – at 1.8km from the approximate centre of the site it's too far for most people to walk according to the CIHT<sup>3</sup> *"People will walk up to 800 metres to get to a railway station"*,

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<sup>1</sup> Between the 2011 and 2021 ONS censuses

<sup>2</sup> The proposed road around the north-west of Crawley from Faygate to Manor Royal has had many names. We refer to it here as the full Western Link Road. The middle section of it, running through the West of Ifield site is referred to as the Link Road.

<sup>33</sup> The Chartered Institution of Highways and Transportation (CIHT) – Planning for Walking (2015)

- Has no space for car parking or passenger drop off, and very limited cycle racks and bus service. The platforms are short, extremely narrow, already crowded at peak times and as a consequence dangerous. The station is constrained on all sides by housing and roads with little or no scope for expansion of platforms or provision of parking,
- Is served by only two trains an hour in each direction at weekday peaks, again with little scope for increased frequency.

Homes England propose only upgrades to the cycle parking and bus interchange, but nothing to increase platform capacity or service frequency. To access more frequent services commuters will need to cycle, drive or bus almost 5km to Crawley station, which has four trains an hour in the peaks.

4. The introduction of a **new secondary school** will necessitate additional drop-off and pick-up journeys, but no detail has been provided about how these will be accommodated given the closure of Rusper Road.

**In conclusion, given its peripheral location the site would only serve to promote the use of the private car. The increase in traffic on the surrounding road network as a result of the site is contrary to both NPPF sections 106 and 111, as well as the Horsham District Planning Framework Policies 2 and 39.**

More traffic and rat-running through Rusper parish

**Rusper will experience a dangerous increase in rat-running due to higher traffic volumes (see above), the closure of the Rusper Road in Ifield, and the non-delivery of the full Western Link Road from Faygate to Gatwick or Manor Royal.**

The problem is that access to the site is very poor – it is peripheral to Crawley and remote from any strategic road infrastructure. Homes England's proposals include a multi-modal Link Road within the site – between Rusper Road and Charlwood Road – but not a direct link into Crawley or to a major strategic route. This means that West of Ifield traffic will be forced to use the existing minor rural roads around the development to access Crawley, Horsham, the A264, A23 and other major routes.

This is exacerbated by Homes England's proposals to close a section of Rusper Road, diverting traffic through the site on the Link Road and then out onto Ifield Avenue and Charlwood Road. It is also likely that many commuters will choose the alternative rat-run through Ifield Wood.

The transport modelling by both Crawley and Horsham Councils clearly indicates that, even with generous trip reduction rates, the existing surrounding roads will be severely negatively impacted by West of Ifield, unless the full Western Link Road is constructed. The modelling also showed that the full Western Link Road would reduce the flows on the surrounding rural low order roads of Faygate Lane, East Street, Rusper Road, Ifield Road, Charlwood Road and Ifield Avenue, as expected.

**It is clear that without the full Western Link Road, the increase in traffic due to West of Ifield would severely impact the roads throughout Rusper and surrounding areas in contravention of both NPPF sections 106 and 111, as well as the Horsham District Planning Framework Policies 2 and 39.**

Horsham and Crawley's Transport Modelling

**There is good reason to believe that the modelling by both Crawley and Horsham Councils could be over-optimistic and aspirational, particularly in terms of trip-reduction rates.** This is important because the modelling also shows that the roads surrounding the development will experience capacity constraints and should the assumed trip reduction measures not be fully successful, these capacity constraints will be exacerbated, worsening the contravention of both the NPPF and Horsham and Crawley local policies.

The generous trip reduction rates used by both Councils are based on the provision of sustainable transport measures including bus services and bus rapid transit routes, and walking and cycle infrastructure. But there is limited detail on these measures for West of Ifield and it is difficult to conclude that they will successfully mitigate against the additional trip generation from the development. Particularly striking is the lack of information about how the Fastway bus rapid transit

system will deliver a shift from car to bus, given it forms the backbone of Homes England's sustainable transport plan.

**In conclusion, the West of Ifield site is in a remote and currently rural location on the far western edge of Crawley and there is a lack of robust evidence to indicate that measures and routes, which are critical in developing infrastructure to widen transport choice and realise opportunities for large scale development, can be realised. This standpoint is contrary to both NPPF and the Horsham District Planning Framework Policies.**

Yours sincerely

*Lisa Wilcock*

Lisa Wilcock  
Clerk to Rusper Parish Council

Enc. Rusper Parish Council Transport Survey

Cc Strategic Planning, District Councillor Liz Kitchen, District Councillor Tony Hogben, Rusper Parish Councillors.