



## West of Ifield

### Homes England response to Rusper Parish Council to Pre-submitted questions

1. **Rusper is a small parish and has no designated A or B roads. All roads in the parish are narrow rural roads and unsuitable for HGV traffic. How do homes England plan to route site traffic so they avoid these roads and the consequential congestion and danger to other road users including riders and cyclists.**

**The Construction Traffic Management Plan (CTMP)** produced by Arcadis in support of the full element of the planning application which sets out the two routes used by construction vehicles during Phase 1 of the development. Thereafter, all construction vehicles are anticipated to access the Site via the Charlwood Road junction.

For the outline element of the planning application, **an Outline Construction Environment Management Plan has been submitted** with the planning application, to mitigate the environmental effects associated with construction traffic. This document outlines appropriate routing of construction vehicles, hours of operation and any driver training requirements. The document would be included in a construction method statement which would be produced once the Principal Contractor is appointed and further information on the quantity and bulk of materials, construction programme and Site logistics is available.

In addition to this, each Reserved Matters Application will have their own detailed Construction Logistics Plan which will be secured either in the Section 106 Agreement, or by planning condition, for approval prior to commencement of any development. which will aim to reduce the environmental impact of the construction, improve the safety for all road users, reduce vehicular impact on peak hour traffic and reduce the number of deliveries. Once a principal contractor has been appointed for each Reserved Matters Application, the construction volumes and programme set out above can be refined accordingly. The Construction Logistics Plan will set out the precise programme, volumes, routing, daily schedule and measures to encourage mode shift. It will set out the size and number of the construction vehicles, how these will monitor and opportunities to reduce the number and size of vehicle, potentially with off-site consolidation centres.

All vehicles will be advised to follow the routing strategy set (see Appendix P of the Transport Assessment). The routes have been determined to minimise the impact on surrounding villages (including the residents of Rusper Parish) and using the primary strategy route network.





Construction vehicles will not be permitted to route to the site via villages of Rusper and Faygate, and via Ifield Wood. Routing of construction vehicles to the site will be continually monitored and if contractors fail to follow guidelines, there will be consequences associated with this. Vehicles will initially route from the Strategic Road Network (SRN) which is located to the south and east of the site, then route through Crawley to the nearby access routes including Crawley Avenue (A23) and Ifield Avenue.

**2. And following on from this question:**

N/A

**3. How do Homes England plan to alleviate the obvious traffic issues by adding the additional traffic to the already overcrowded local minor roads system. The current average number of cars per household in the UK is 1.2. Introducing an additional 3600 cars to the roads from the initial development. What relief roads are planned to filter cards away from the rural network.**

As set out in the **Transport Assessment** supporting the planning application, the development will generate an increase in traffic using surrounding roads in the peak hours and across the day. However, it should be noted that the additional traffic does not get added to the road network at the same time and trips to and from the development will be dispersed throughout the day.

The submitted Transport Assessment fully considers trip generation and distribution. **Chapter 8 highlights that the development will generate 939 two-way external car driver trips in the morning peak hour (08:00-09:00) and 1.351 two-way external car driver trips in the evening peak hour period (17:00-18:00). These two time periods have been extensively modelled as they represent the busiest periods on the highway network.** As part of this testing, necessary mitigations have been identified to ensure increases in traffic movement are acceptable and in line with national guidance. A summary of the approach is provided below:

The starting point is to try and reduce people's reliance on the car and then mitigate the remaining car-trips. This is done by:

- Delivering a mixed-use development so that people can go about their day to day routines, without having to leave the site, i.e. trip to primary and secondary school, employment land use, creche, community centre, leisure, healthcare and retail facilities.
- Including a multi modal corridor with high quality bus infrastructure, including bus lanes, and well designed, segregated pedestrian and cycle facilities between local centres to allow people to move safely and conveniently around the development, without having to use a car.
- Integrating a high frequency bus service into the development, linked to key destinations within Crawley so people can access work, leisure and the station without the need to rely on a car.
- A car parking strategy which acknowledges current and future demand, which is expecting to decline, given peoples attitude to travel, especially within the younger age groups.





- Mobility hubs designed to conveniently facilitate a change in the mode of sustainable travel i.e. bus to cycle
- Car clubs to allow people access to a car without having to own one, thus reducing car ownership across the site.
- Improvements to local walking and cycling routes along key desire lines to make these options attractive, safe and desirable for both existing and future residents.
- Contribution towards improving facilities at Ifield Station to enhance the station experience, including the potential for additional cycle parking, lighting, enhanced station entrance and enhanced waiting areas to facilitate modal change.
- Residential, Commercial and School Travel Plans to promote sustainable travel. The overarching aim of the Travel Plan is to influence residents and staff to travel by active modes (walking and cycling) and public transport, wherever possible, in order to maximise benefits to public health and minimise the impacts of the Proposed Development. The TP measures proposed will also have benefits for the neighbouring community and support the Crawley Transport Strategy Chapter 6 of the TP details possible measures that could be introduced to achieve the targets set. Table 6.1 in this chapter sets out the benefits of various measures and the timescale and responsibility for implementation.

There will also be improvements to key junctions locally including Ifield Avenue / Warren Drive and Ifield Avenue / Stagelands.

The CWMMC has been provided as a multi-modal route within the development. The following principles are being provided:

- Single carriageway with a continuous bus lane in each direction.
- Segregated wide cycleways separate from footways with priority at junctions.
- Segregated footways, minimum 2.0m and widening in the neighbourhood centre.
- Varying speeds, including 20mph through the neighbourhood centre and 30mph elsewhere were appropriate.

These mitigation measures have been tested through the Transport Assessment and will be secured by Section 106 and Section 278 legal agreements.

**4. On traffic it does appear they are planning mitigations for increased traffic, but there are plenty of questions remaining.**

Please see response above.

**5. All the questions below are relevant for Rusper PC, i.e. they're concerned with impacts on parts of the parish, EXCEPT 8 and 9. Ifield Green is not in the parish. It may be that we don't ask these.**

N/A





**6. Homes England were working on a masterplan for 10,000 houses between Horsham and Crawley - of which West of Ifield was seen the first part. There are rumours circulating locally that surveys have and are being carried out on the land from Ifield to Faygate. Are surveys and planning taking place connected to the planning for the other 7,000 houses?**

At Regulation 18 stage of the Horsham District Council draft local plan, Homes England were looking at a masterplan for 10,000 homes for a West of Crawley opportunity area identified by the Local Authorities. This option did not progress, and Homes England is firmly focused on this hybrid planning application for 3,000 homes.

Any wider development would be the subject of any future Local Plan process and is not related to this planning application. We have been clear that any decision on future strategic growth to best meet long term housing needs sits with the Local Planning Authority. This would need to be promoted through a new Local Plan and would be subject to the requirements of Horsham District Council at that time.

Passive provision has been built into the design of the CWMML to enable a future extension in accordance with the infrastructure planning aspirations of both Crawley Borough Council, Horsham District Council, West Sussex County Council and the South East Transport Plan. The design of the CWMML does not prejudice the longer-term transport objectives being achieved. The current application is not dependent on the full link being delivered, as evidenced in both the respective Crawley Borough Council and Horsham District Council local plan transport modelling evidence.

In respect of surveys, due to seasonal survey windows ecological surveys are ongoing in the vicinity of the site, to ensure data is as up to date as possible.

**7. When will the Environment Agency report on the sustainability of the proposed groundwater abstraction?**

The Environment Agency has been consulted extensively throughout the groundwater assessment and exploration licensing and drilling process so are well informed of the proposals. They will be consulted again as part of the planning application.

We remain confident in the outcomes of the groundwater assessment reported as part of the planning application and suitability to deliver the intended water neutrality strategy.

It is anticipated that the Council will apply a planning condition to any permission, seeking details of a final mitigation scheme prior to commencement or occupation. As part of this process, the EA will be consulted and approval required as part of securing the necessary licences.





**8. Crawley sewage works are almost at capacity as noted in Crawley's Local Plan and acknowledged by Thames Water. The application doesn't address the capacity issues, or discussion with Thames Water to ensure capacity. How are discussions going with Thames Water? What are their plans for investment to increase capacity and how long will this work take to complete?**

Homes England has undertaken early and continued engagement with Thames Water to ensure that the proposed scheme forms part of their long term modelling and is included within their long term Asset Management Plans so that the necessary upgrades can be delivered alongside other development within the catchment area. As part of this process, Homes England has ensured that a robust assessment of future demand has been captured which has included a sensitivity around overall development capacity, phasing and not making an allowance for any reductions resulting from achieving water neutrality across the scheme.

Discussions with Thames Water has confirmed sufficient capacity can be provided within the Crawley WwTW and identified a number of capacity improvements to the strategic foul water network to meet future demand from West of Ifield and other development from across north Horsham and Crawley area. Where upgrades are required within the scheme, sufficient space has been protected within the layout to ensure upgrades can be delivered in a timely manner.

Homes England expect that occupation of each home will be subject to adequate capacity being provided. This will be funded by Thames Water and investment recouped under future service provision, which is a standard approach for new development. Further information is contained within the Utilities Statement provided as part of the submission.

Thames Water have now commented on the planning application, requesting two pre-occupation conditions to secure upgrades to the foul network.

**9. The application gives detail on affordable housing delivery, but how much social housing (at least 40% below market rent or sale price) will the site deliver?**

Pre-application engagement with Horsham District Council and Crawley Borough Council resulted in an agreed blended housing mix and tenure. The blended housing mix determined by both Local Planning Authorities is based on the needs of both Horsham and Crawley. This proposes affordable and intermediate tenures for affordable housing, not social rent.

The most commonly used definition of affordable housing tenure is set out in the National Planning Policy Framework (Annex 2), which states "housing for sale or rent, for those whose needs are not met by the market". An 'affordable rent' is up to 80% of market rents and an 'intermediate rent' level (between social and market rents). It also includes low-cost home ownership. This is housing sold at a discount of at least 20% below local market value, Shared Ownership, where people buy a share of a property and pay a subsidised rent on the remaining share, and Rent to Buy where people rent at around 80% of market rents in order to save for a deposit to buy the property.





The planning application proposal has been reinforced by the Housing Officer's response to the planning application, available on the Horsham District Council website:

[https://iawpa.horsham.gov.uk/PublicAccess\\_LIVE/Document/ViewDocument?id=A2013DACF5774128B1726D8E50220F84](https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=A2013DACF5774128B1726D8E50220F84)

Homes England will work with both LPAs to provide a housing mix and tenure, which meets the needs of the area. The final detail of the proposed affordable housing will be determined as part of the Section 106 Legal Agreement. This will enable the opportunity to review the affordable housing mix and tenure on a phased basis as part of each Reserved Matters application, to ensure the provision responds to the needs at that time.

Homes England is committed to supporting the delivery of affordable homes both through the planning process and in directly supporting Registered Providers through the affordable housing grant programme, which has recently received significant further investment following the Spending Review announcements by HMT.

**10. The application describes a strategy of “decide and provide” for mitigating traffic impacts – i.e. monitor effects and put in mitigations as necessary so as not to overprovide now, which might encourage car use. As opposed to “predict and provide”. This requires installation of a robust monitoring system: “The impacts of the development will be monitored regularly with a review of observed trips against anticipated trips, and whether junctions are operating as predicted. This will allow mitigations to come forward earlier or later than anticipated”. What are the plans for this monitoring system, where will it be, how long will it remain in place and who will fund it?**

A fundamental part of the ‘decide and provide’ approach is the need to monitor the outcomes of its implementation through the Travel Plans accompanying the development proposals.

A Monitoring and Evaluation Plan (MEP) will be provided prior to commencement of development and secured and implemented through the Travel Plan as part of the S106 agreement. The monitoring approach will include the following key elements:

- Appointment of Travel Plan coordinator to regularly meet with WSCC Highways.
- Ongoing monitoring of trip generation from the Site to be closely monitored through regular travel surveys.
- Continuous observation of conditions on the local highway network Implementation of remedial measures if trip generation exceeds forecast levels. These measures may include accelerating modal shift initiatives or delivering off Site interventions to provide the necessary capacity enhancements.

Data will be collected through resident and employee surveys and traffic counters, both permanent and temporary. The surveys will continue on an annual basis once the development is fully complete. The





timescales for ongoing surveys will be agreed with the Council but is usually 5 years. The surveys will follow industry standard methodologies and take account of all travel modes from all access points. Additional surveys will also consider qualitative data around travel behaviours.

The MEP will be funded by Homes England and subsequent developers as part of the delivery of their land parcel. The requirement for monitoring, and mitigation where necessary, will be secured via a Section 106 Agreement.

**11. During Phase 1, before the main link road is in place, construction traffic will be approaching the site via Gossops Green, Tangmere Road and Rusper Road to the golf course. These roads are the existing access routes for Ifield station and the primary and secondary schools next to it and are already considered dangerous due to being busy and narrow with very narrow pavements in places. How will the safety of pedestrians, cyclists and other road users be ensured while these roads are being used by construction traffic? How will construction traffic be prevented from approaching the site via the villages of Rusper and Faygate, and via Ifield Wood from the Charlwood Road?**

As with the response to question 1, **the Construction Traffic Management Plan (CTMP)** produced by Arcadis in support of the planning application which sets out the two routes used by construction vehicles during Phase 1 of the development.

Thereafter, all construction vehicles are anticipated to access the Site via the Charlwood Road junction. For the outline element of the planning application, an Outline Construction Environment Management Plan has been submitted with the planning application, to mitigate the environmental effects associated with construction traffic. This document outlines appropriate routing of construction vehicles, hours of operation and any driver training requirements. The document would be included in a construction method statement which would be produced once the Principal Contractor is appointed and further information on the quantity and bulk of materials, construction programme and Site logistics is available.

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**12. What are the plans for extending cycle paths outside the development and who is funding the work? In particular: the cycle paths along Rusper Road towards the golf course (and future secondary school); the paths across Ifield Brook Meadows; and the connections to the wider cycle networks in Crawley?**

Homes England is committed to delivering and or contributing to a wide range of pedestrian and cycle infrastructure projects between the development and Crawley, many of which are included within Crawley's Local Cycling and Walking Infrastructure Plan (LCWIP). This includes Rusper Road, which will experience a reduction in traffic as a result of the proposal, making it more suitable for walking and cycling, as well as connection across Ifield Brook Meadows.

The Crawley LCWIP sets out suggested improvements to encourage cycling across the wider Crawley area. [https://crawley.gov.uk/sites/default/files/2020-07/Crawley%20LCWIP%20Full%20report\\_0.pdf](https://crawley.gov.uk/sites/default/files/2020-07/Crawley%20LCWIP%20Full%20report_0.pdf)

To ensure the route from West of Ifield to Manor Royal is a high-quality cycle route, Homes England are committed to funding improvements from the Charlwood Road / CWMMC junction to Langley Walk (route M in LCWIP) and then along Ifield Avenue to A23 London Road (Route P). Route L, to the south via Rusper Road, provides access to Crawley town centre via Ifield Station.

**Please see the submitted Infrastructure Delivery Plan** for a high level overview of funding and delivery, which is also captured in the draft heads of terms. There is a helpful **illustrative plan in section 10 of the Transport Assessment (Figure 10.1) and Appendix Q.**

**13. It has been decided that following the closure of Rusper Road, Ifield Green should be used as the key route for diverted and additional car travel to Ifield and Ifield Station. But Ifield Green is within the Ifield Village Conservation Area. How does this decision to divert traffic through a Conservation Area reconcile with the protection of heritage assets?**

The Transport chapter of the Environmental Impact Assessment (EIA) sets out where increases in traffic will occur as a result of the development, with a **Heritage assessment (chapter 10)** which assesses the impact on any heritage assets.





The Heritage Assessment acknowledges that there are expected to be reductions in traffic flows on Rusper Road and Ifield Green, once the CWMMC is built and in use. This is expected to be to the benefit of the character of the Ifield Green Conservation Area.

Whilst the Heritage Assessment acknowledges that there will be an increase in noise and disturbance from traffic from a combination of the Gatwick Airport northern runway project and the West of Ifield during construction, this is not deemed to be “significant”. Significance is a test set out in the Environmental Impact Assessment legislation and National Planning Policy Framework.

The Heritage Assessment recognises that the increase in traffic during construction would affect the setting of the following heritage assets: Finches Cottage, Turks Croft, St Margaret's Cottage and Brook Cottage. However, the change in their setting would not be significant.

The residual effect, determined by the Environment Impact Assessment on Ifield Village conservation area once the scheme is operational, and any mitigation is taken into account, is moderate adverse as described in the Heritage Assessment.

In the context of this response to the Parish Council, it is noted that Ifield Green and the Conservation Area is outside the boundary of Rusper Parish Council.

**14. What measures are planned to ensure the safety and traffic flow along Ifield Green? It already has speed bumps which are ineffective, and is narrowed to one car-width in many places due to residential parking. How is the risk of gridlock being mitigated?**

The Transport Strategy has been subject to detailed traffic modelling which demonstrates that following the proposed highways works, that gridlock does not occur on the Ifield Green arm of the new signalised junction with Charlwood Road or across the wider network, and the junctions operate within acceptable capacity. The Decide & Provide Monitoring and Mitigation Plan will set out agreed thresholds whereby if certain criteria are not met, Homes England will be required to deliver or make payment to West Sussex County Council for the necessary mitigation. This will include a funding mechanisms pot for later mitigations (e.g. schemes such as Rusper Road traffic calming, or the Ifield Avenue works, should this be deemed necessary after monitoring and / or consultation. This approach will mean that impacts will be continually monitored as the development is built out and if necessary, additional interventions can be considered.

