

Examination of the Horsham District Local Plan 2023-2040

Hearings: week 2-3 - October 2026

Written statement from Save West of Ifield

Matter 5b: The Spatial Strategy and site selection process

i. Spatial distribution

a. Consideration of Crawley

The Plan is inconsistent in its consideration of Crawley, and possibly unsound in its failure to consider and plan for the impact of the West of Ifield (Wol) on Crawley.

Wol is described (para 10.88) as “*part of the wider urban form of Crawley*”, i.e. an expansion of an existing settlement. And para 10.26 suggests that decisions about strategic growth have been made based on the settlement hierarchy: “*The starting point for strategic-scale growth has been general conformity with the District's settlement hierarchy as set out below: • Land West of Ifield, Crawley ...*”

But this is inconsistent with the following:

- Crawley is not mentioned in the Plan’s **settlement hierarchy**, potentially rendering it unsound given the impact of the Wol scheme on Crawley. We suggest that **Strategic Policy 2 is amended to include Crawley in Table 3: Settlement Hierarchy, as a Main Town.**
- **The Plan and the Sustainability Appraisal (SA) fail to adequately assess and mitigate for the impacts of Wol on Crawley.** The dependence on Crawley’s infrastructure and the full social and environmental effects are not appraised, and the appraisal is built upon evidence about Horsham whereas Crawley’s evidence base should underpin the allocation of Wol and be part of the SA. Wol scored more favourably than other sites in the SA because the negative effects on Crawley are not considered.
- The Wol planning application is strongly opposed by Crawley Borough Council which suggests a failure to consider cross-boundary strategic matters (Plan para 2.5, NPPF 26, 27 and 74). The allocation of Wol means the Plan is not Effective (NPPF 35) and is therefore unsound.

b. Coalescence of Horsham and Crawley

Wol is the first phase of Homes England’s 10,000 house plan which will merge the settlements of Horsham and Crawley, and should be assessed as such. Para 10.84 mentions the 10,000 proposal but says its deliverability cannot currently be demonstrated.

We note that both Horsham and Crawley officers asked that the 10,000 plans be considered as part of the Application’s EIA process (2020 scoping exercise) but Homes England dismissed this. See Appendix A.

We know that Homes England is currently surveying the land between Horsham and Crawley, plus we note from the application that the Market Square will be located not at the centre of the 3,000 site, but on the Horsham edge.

Is it sound to consider the 3,000 house proposal in isolation from the rest of the 10,000 plan? It feels wrong and similar to bid-splitting to avoid mandatory procurement thresholds. It may also contravene the BNG legislation which appears to include specific policy for phased large residential developments.

c. Reducing the need to travel

The Wol development would significantly increase car use and the volumes of traffic in the area, despite any increase in bus services.

Spatially the site is peripheral to Crawley’s facilities, very poorly connected in terms of roads, with a large new secondary school at the furthest point from the existing town and railway station. As mentioned in our Main Mods comments, the SA ignores this, and the risk that Crawley’s facilities will be pushed over capacity, so the score of ++? for **Services and facilities** (SA2) is too high and we suggest neutral +/-.

Interestingly, at Reg 18 stage the SA stated that “*The site is not within walking distance of any town centre locations in the District or Crawley Town Centre.*” Why the change? Crawley town centre remains over 2km from the edge of

the site. And only the houses on the extreme east of the site might be within 720m of Ifield shops and GP surgery, as per the SA's own definition: "Sites that are within 720m of the built-up area of the Main Town (Horsham), the town of Crawley ... will have a significant positive score".

The SA is also unsound for Transport (SA13) because it doesn't adequately consider the impact on traffic volumes and key junctions in Crawley. The score of ++/-? should be significantly reduced to strongly negative [--] because:

- The 2015 SA score was --?, acknowledging the impact on Crawley's significant congestion issues if no mitigation and the cumulative effects of other development (e.g. Mowbray), and Gatwick expansion.
- There was no evidence for the improved score in 2021 or now. Crawley's congestion has worsened, Gatwick expansion is approved and the site still has an exceptionally poor relationship with the existing strategic road network – the nearest A road is 1.6 km away via already congested residential roads, or via rat runs along dangerous country lanes. Plus the new secondary school is located at the furthest extent. **Net result is increased car use, congestion, emissions and poorer air quality.**
- Where is the mitigation? The 2021 SA noted "... **the delivery of the middle section of a new relief road will not address existing private vehicle congestion, and is proposed to be used for public transport access. Possible eventual delivery of the Crawley Western Relief Road may help to alleviate congestion in the area but is likely to reduce the potential for the achievement of modal shift**", and that most local people commute by car rather than train.

So presumably the mitigation rests solely on "... the potential for the new development to promote modal shift"¹? In which case the positive shift in the scoring is not justified, and neither are the related scores for Air quality and Climate change. The SA concedes that "The scale of the development at the site may result in increased traffic ..., contributing to increased carbon emissions. There is still potential for development at the site to result in increased traffic within the Hazelwick AQMA." Hence for **Air quality** SA14 – instead of ++/--? we suggest --? In line with the 2015 score for Environmental quality. And for **Climate change** SA15 – instead of +/-? we suggest minor negative [--] in line with the 2015 score.

Homes England's planning application (DC/25/1312) makes clear that their proposed mitigations against increased congestion rely on a **significant modal shift**². But National Highways and WSCC Highways find the proposed shift "very ambitious", with a lack of evidence for this being achievable. We think there are many barriers to it being achieved, including:

- Planned cycle routes *within* the site joining busy narrow roads *externally* without cycle lanes and limited or no pavements. WSCC note that the lack of detail about this onward connectivity is "very much a concern",
- The local bus operator notes³ several concerns: "The level of service proposed is ambitious but will be very expensive to operate requiring very significant levels of subsidy and may struggle to be commercially viable when this ends. The concept of route B being commercially viable from the outset when there are minimal occupants is unrealistic. ... The proposal expects a mode share of 20% which is very ambitious and much higher than is achieved virtually anywhere in the country. ... The narrow bus lane arrangement on Rusper Road is a concern and needs to be revisited."
- WSCC also note⁴ that "concerns are raised as to the deliverability of the bus strategy". **Rusper Road is narrow⁵, and with its inadequate footpaths is already a safety risk** for primary pupils walking and scooting to and from school and their parents navigating the pavements with pushchairs. As a local resident said, having just observed a bus mounting the pavement to pass a second bus "This is a tragedy waiting to happen". **This is also the route for Homes England's Phase 1 construction traffic to access the site⁶.**
- A lack of evidence that the reduction in parking spaces will encourage the modal shift; experience across Crawley suggests it is more likely to increase on-street parking.

¹ Summary of scoring for strategic sites – para 5.35.

² West of Ifield Transport Assessment, Steer, July 2025 para 4.2/4.4.

³ https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=B0B75CCA95AA4EAE927A3A68EDA6A7DE

⁴ https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=CC0216259E654CAC8C7C06845987377F

⁵ https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=0EBED4C9A2144F48AA1020AE5A961695

⁶ See WSCC Highways response to the planning application, May 2026, paras 32 and 33

https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=A52FF1DE20634760B493BB2F6F5D0DA8

⁶ WSCC Highways response to the planning application, May 2026, para 122

d. The highway network

We realise it must be difficult to keep the evidence base of an emerging Plan up to date. But **we note that HDC's traffic modelling⁷ is not incorporating the proposed increases in housing delivery at Wol (+900) and Kilnwood Vale (+350).**

The Assessment states:

2.2.2 Since undertaking the modelling, the number of dwellings planned for the LP period have increased and the numbers could change further. However, the change in numbers would not have a material impact on the modelling at the strategic level undertaken to support the Plan.

But we're concerned that Crawley's well-known hotspot – Horsham Rd WB Approach - Cheals Roundabout (C23) – already has the highest traffic volume to capacity ratios in the District at over 133%, and so any further increases must be taken seriously.

Using an increase of 1,600 houses in the Plan period rather than 2,850 means that a key input for Crawley modelling is understated, by 78%. If the impacts are also 78% higher then this would add an extra 2 percentage points to the traffic volume to capacity ratios.

Any understatement of traffic impacts should be corrected, particularly when the proposed mitigation is a questionable modal shift which is considered "very ambitious" by National Highways.

e. The rail network

The SA⁸ and Site Assessment⁹ score the site as Favourable in terms of public transport and state that "the site is located within walking distance of... within 1km of..." and is "relatively close to" Ifield Railway Station, but this is incorrect and **the proximity of, and capacity of, Ifield station should be given a negligible weight in the decision-making** (see Appendix B):

- The site is not within 'reasonable walking distance' of Ifield station. None of the proposed housing falls within 800m or 10min walk, and only a quarter would be within a 1,200 metre walk of the station and only if the proposed cycle and footpath through Ifield Brook Meadows is approved by Crawley BC (not yet applied for). Without it none of the housing is within 1,200 metres. **The walk from the secondary school will be over 1,710 metres, and over 21 minutes.** See our recent representation to the planning application.
- **People will drive to the station or be dropped off, but there is no capacity for either,** and no space for future provision. The busyness of the junction at the station and Mill Primary School, and lack of drop-off space for either, already means chaos with cars queuing past the school and through the petrol station. And worse of course on rainy days.
- The SA (page 121) also downplays the role of the station in promoting active travel: "*Commuting patterns for the area based on 2011 census data indicate that, despite the site being within 1km of a railway station, few people commute to work using the train. The majority of people in the area commute via private car and new development at this location has the potential result in new residents adopting similar travel habits*".
- Although Ifield station just meets the new NPPF criterion for 'well-connected', the service levels are poor. In 2025 Ifield was Britain's worst station for cancellations; 10.4% of trains did not stop as scheduled (<https://www.bbc.co.uk/news/articles/c9dx656v547o>).
- Its platforms are short (five carriages) and dangerously narrow, with no available land for expansion.

f. Site selection – financial viability

The Council's updated (June 2026) Whole Plan Financial Viability Assessment (WPFVA) is wholly inadequate for plan-making. It presents nowhere near enough detail or evidence of viability for developments of the size and

⁷ Horsham Transport Study Local Plan 2040 Transport Assessment June 2026 (Stantec) and erratum.

https://www.horsham.gov.uk/data/assets/pdf_file/0020/165422/Horsham-Local-Plan-2040-Transport-Assessment.pdf

⁸ Page 124 https://www.horsham.gov.uk/data/assets/pdf_file/0004/104593/Final-SA-Report-for-Horsham-District-Local-Plan-Reg-19-Appendices-document-Reduced-size.pdf

⁹ Page 88 https://www.horsham.gov.uk/data/assets/pdf_file/0004/165433/HDC-Site-Assessment-Strategic-Sites.pdf

complexity of the Plan's strategic sites. This is particularly true for Wol with its need for costly mitigations, and the uncertainty about the number of units the site can support.

The enormous revisions to the results for all strategic sites between the 2023 and 2026 WPVAs, with no explanation, cast serious doubt on the accuracy and usefulness of these WPVAs. Wol's infrastructure costs have doubled from £63m in the 2023 WPVA to £130m in the 2026 version, taking it from the most to possibly the least viable of the potential strategic sites.

For the draft Plan to be sound we suggest that:

- A more robust WPVA is published, covering all strategic sites, with much more detail and breakdown of the underlying data of the tenures and sizes of housing, and itemisation of costs within the infrastructure, s106 and CIL contributions headings, and
- Policy 39: *Affordable Housing* is amended to include a new clause, which is also repeated in the site-specific policies, such as HA2:

"For all strategic sites, HA2, HA3, HA4 and HA(NP1), a full and detailed financial viability assessment is required at outline planning application stage."

More detail provided in our Main Mods comments.

ii. Constraints

a. Water and sewerage

We argue that the draft Plan should be much more explicit, with stronger policies, with regard to water supply and wastewater treatment. We suggest policy tightening of SP23 given the current exceptional uncertainty around the viability and future of Thames Water and Southern Water, their unacceptable records for sewage spills and pollution and the current lack of processing capacity. The Plan should acknowledge and mitigate for these significant risks.

The use of phasing conditions alone is not enough. They add yet more uncertainty to Plan delivery, and they should be used in conjunction with concrete plans for upgrades and service delivery.

Policy tightening is needed to prevent developers simply assuming that the legal obligations on utility companies to provide services will guarantee that services will be provided in line with the Plan. **Evidence should be required at outline application stage to show that the utility company has a draft funding and delivery plan for any upgrades.**

The Plan's para 8.5 (SP23) and Policy HA2 should be modified to require developers:

"... to provide, at outline planning application stage, clarity on the timing and funding of any upgrades."

This would better accord with NPPF para 128c: *"planning policies and decisions should support development ... taking into account ... the availability and capacity of infrastructure and services"* and NPPF 20b which requires local plan policies to make "sufficient provision" for sewerage infrastructure. We suggest that policies SP23 and HA2 are not sound unless they are strengthened.

The strengthening of HA2 is especially important given the current lack of sewage treatment capacity at Crawley wastewater treatment works (WwTW), the risk of polluting the River Mole, and Homes England's resistance to phasing conditions as part of the current planning application negotiations.

b. Constraints on sites due to Gatwick

We note that the views of **Gatwick Airport Limited (GAL)** have not been considered in the allocation of the Wol site. GAL's strong objection¹⁰ to the Wol planning application was lodged *"... on grounds relating to aerodrome safeguarding, noise, water and surface access"*?

GAL is concerned that the site is incompatible with its masterplan for an additional runway to the south of the existing one and concludes that ***"The proposed development is contrary to national and local planning policy and guidance on aircraft noise and would be better located elsewhere where future aircraft noise levels associated with future growth at the airport are lower."*** GAL notes that ***"there is no design that can avoid unacceptable adverse effects in the planning sense other than to not build at all."***

¹⁰ [Gatwick Airport Ltd. response to the application](#), November 2025

iii. Housing delivery

The risks to delivery of the house-building trajectory seem substantial, and we find it very surprising that there is no discussion of uncertainty or risk management in the Plan.

The Main Mods comments from CPRE¹¹ articulate the issue:

The issue is therefore twofold: whether the 18,712-dwelling requirement and the trajectory needed to deliver it have been shown to be realistically achievable, and whether the proposed additional supply provides sufficiently reliable and timely delivery headroom...

*The Housing Delivery Study identifies significant challenges in achieving the proposed trajectory. **Delivery must increase sharply from current levels and remain at historically high rates for a sustained period....***

In terms of achieving historically high rates of delivery, HDC state¹² that their trajectory can be “relied upon” due to their “strong track record of delivery” (para 13), but they don’t explain when. In fact, high delivery was only achieved from 2016 to 2019, when demand was heavily stimulated by Help to Buy and low interest rates. We are very far from this world now and for the foreseeable future. **Surely assumptions about reliable strong delivery have to be evidenced for the Plan to be sound?**

HDC’s evidence shows that only 8% of the 2015 allocation at Mowbray has been completed, and possibly only 50% at Kilnwood Vale.

Plus there is a significant but unacknowledged risk that Wol will not deliver 2,500 homes by 2040, not least because of the need to expand sewage capacity at Crawley WwTW before any houses can be occupied, which could take up to 10 years as noted in Crawley BC’s Local Plan¹³.

Can a Plan be sound with a delivery trajectory that ignores the clear need for phasing conditions, which must have been known about for years? It seems paradoxical to present a build-out rate for a site that almost certainly can’t be delivered. **Either the delivery trajectory should reflect realistic rates of delivery from Wol, or the site is removed from the draft Plan and replaced with a site(s) which can deliver at the required rate.**

Omitting to mention and mitigate for these known delivery risks seems counter to sound planning. We suggest that these risks can be mitigated by strengthening policies SP23 (para 8.5) and HA2 with a further modification to require developers: “... **to provide, at outline planning application stage, clarity on the timing and funding of any upgrades.**”

¹¹ CPRE response to MM142

¹² Hearing Statement, HDC’s Matter 2: Housing supply and headroom Topic Paper

¹³ Crawley BC Local Plan Policy IN1, para 8.12: “Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.”
<https://crawley.gov.uk/sites/default/files/2024-11/Crawley%20borough%20Local%20Plan%202023%20to%202040.pdf>

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APPENDICES for Matter 5b: The Spatial Strategy and site selection process

APPENDIX A. The 10,000 house proposal

Although Homes England have a live planning application (DC/25/1312) for 3,000 houses West of Ifield, they've made clear in previous stakeholder presentations that this is phase 1 of a masterplan for 10,000 houses and a Western Link Road (bypass) from Faygate through Lambs Green to Manor Royal / Gatwick.

But there is no mention at all of this in the application. This is a change from the 2020 EIA scoping request which discussed Potential Cumulative Effects, including (para 4.8.6) *"Potential future expansion of a wider West of Crawley Garden Town Strategic Opportunity to the south-west of the site that could comprise in total approximately 10,000 new homes when including the proposed homes as part of the proposed Development. There are no specific proposals for this wider opportunity at the moment, however dialogue is ongoing through the HDC Local Plan preparation process."*

The implications of the full 10,000 proposal with WLR should be assessed now. This approach is in line with the responses from Horsham and Crawley planning officers to the 2020 EIA scoping request:

- Jason Hawkes (Horsham District Council Principal Planning Officer) wrote: *'Reference should also be made here to the aspirations of the [3,250] site to be part of a wider scheme for up to 10,000 dwellings for the land to the west of Crawley. The land west of Ifield is the first phase of this wider development which is intended to deliver a link road joining the A264 to the south to the A23. It is important that this narrative is outlined in the EIA so that cumulative impacts can be considered where necessary.'*
- And Crawley Borough Council responded similarly: *"Homes England has promoted a much more extensive development for up to 10,000 homes on land West of Ifield. While this is understood to be speculative, the other proposed phases should be identified in some way or at least recognised. This is critical as some of the proposed solutions for the ES and the proposed development may be affected by the potential further expansion of the development over the longer term (for example flood mitigation or biodiversity). It would also allow the cumulative impacts to be better assessed."*

Similarly the new legislation around Biodiversity Net Gain includes specific policy for large residential developments to be delivered in a phases, such that applicants will be required to explain (at OPA) the strategy to achieve the biodiversity gain objective across the whole site and to demonstrate how this could be delivered on a phase-by-phase basis¹. While the planning application will principally refer to the 3,000 site, we would expect significant reference to the potential for the 10,000 development in the Homes England EIA.

¹ See the Government's current policy position regarding BNG for phased development here – Feb 2023: <https://www.gov.uk/government/consultations/consultation-on-biodiversity-net-gain-regulations-and-implementation/outcome/government-response-and-summary-of-responses>

APPENDIX B. Traffic and transport West of Ifield

The following is an extract from SWOI's October 2025 response to Homes England's planning application for the West of Ifield (DC/25/1312).

We're very concerned that the negative impacts of the introduction of more traffic into an already congested area will be more severe than Homes England predicts. We believe that the constraints of the West of Ifield site make this inevitable and cannot be mitigated. The proposed mitigations appear to rely on a significant shift away from car-use to cycling, walking and bus-use, but as noted in the responses from National Highways and WSCC, the application lacks evidence for this being achievable.

Background

1. **Homes England's *Environmental Statement Non-Technical Summary* is misleading in claiming that the West of Ifield site is well connected to the existing highway network:** *"The Site is well connected to the highway network via Rusper Road and Charlwood Road, with easy access by road to London and Brighton, and to the strategic road network via the M23 junctions 10 and 11. Charlwood Road to the north of the Site and Rusper Road to the south, are both single carriageways."* **But the site is NOT well-connected and it suffers from considerable transport constraints.** The site is bounded on its eastern border by rivers (Ifield Brook and the River Mole). Crawley is on the other side of the rivers. On the western boundary is farmland. Ancient woodland forms the southern boundary. Beyond the ancient woodland is the Crawley to Horsham railway line and Ifield Mill Pond (a large expanse of water). The northern border meets the Charlwood Road, a category C country road. The other road related to the site, Rusper Road, (also category C), is *towards* the southern end of the site but *does not form the southern boundary*; it divides the site in two and has existing residential buildings along it.
2. **Despite these constraints, the Planning Statement is clear that West of Ifield is proposed as a Crawley extension. But insufficient account is taken of the fact that Crawley's A roads are congested at peak times with daily tail backs and delays.** The A264 and A2220, linking the west side of Crawley with Horsham are overloaded and have become increasingly so with the development of Kilnwood Vale and North Horsham. These east-west roads meet the A23 at the Cheals roundabout forming a traffic hotspot with, not only delays, but frequent accidents or near accidents. The crossing on the A2220 near the roundabout is used by school students en route to three secondary schools nearby: Thomas Bennett, Holy Trinity and St Wilfrid's.
3. Internally many of Crawley's neighbourhood roads are reduced to a single lane by roadside parking, as the level of car ownership far exceeds that anticipated by the original planners. Attempts to avoid delays on main roads by taking back routes through neighbourhoods, will not solve the problems and will compromise the safety of pedestrians in these areas.
4. See our short film² (2 minutes 20 seconds) which illustrates existing congestion on some of the roads discussed here, and some of the proposed mitigations.

Traffic congestion mitigations

5. **Homes England's proposed mitigations against increased congestion rely on a significant "modal shift", i.e. a behavioural shift away from car-use to cycling, walking and bus-use³. But as noted in the responses from National Highways and WSCC, the proposed shift is "very ambitious", with a lack of evidence for this being achievable.** We think there are many barriers to it being achieved, including:
 - Planned cycle routes *within* the site joining busy narrow roads *externally* without cycle lanes and limited or no pavements. WSCC note that the lack of detail about this onward connectivity is *"very much a concern"*,
 - Crowded counterflows of pedestrian traffic on narrow pavements will encourage car travel,
 - WSCC note⁴ that *"concerns are raised as to the deliverability of the bus strategy"*. To which we would add our concerns about the safety of additional bus routes using roads which are narrow, with unsafe narrow pavements and where there is limited space for improvement,

² <https://youtu.be/4bQc-QtVaZA>

³ West of Ifield Transport Assessment, Steer, July 2025 para 4.2/4.4.

https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=B0B75CCA95AA4EAE927A3A68EDA6A7DE

⁴ https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=0EBED4C9A2144F48AA1020AE5A961695

Buses passing each other on Rusper Road near Tangmere Road, one mounting pavement. Also note narrow pavements and lack of cyclepaths.



- The local bus operator notes⁵ several concerns: *“The level of service proposed is ambitious but will be very expensive to operate requiring very significant levels of subsidy and may struggle to be commercially viable when this ends. The concept of route B being commercially viable from the outset when there are minimal occupants is unrealistic. ... The proposal expects a mode share of 20% which is very ambitious and much higher than is achieved virtually anywhere in the country. ... The narrow bus lane arrangement on Rusper Road is a concern and needs to be revisited.”*
 - A lack of evidence that the reduction in parking spaces will encourage the modal shift; experience across Crawley suggests it is more likely to increase on-street parking.
6. Homes England acknowledges that increased traffic emerging from the CWMMC along Ifield Avenue towards Crawley would constitute a “residual negative impact”. Hence its mitigations are predominantly on this stretch of road. While these mitigations may lead to cars taking turns at junctions and improved sight lines, the tail backs (already severe at peak times) will encourage more rat-running through both Langley Green and Ifield neighbourhoods. Stagelands in Langley Green is particularly susceptible to this as it forms a route to the A23 further north either at the Tushmore Gyratory or at Martyrs Avenue. However, drivers would be passing two primary schools and the neighbourhood centre with its 20 mile an hour speed limit introduced to increase safety, particularly for children crossing. Ifield Green and Warren Drive on the Ifield side will be particularly impacted by people needing to access the station by car.

Other impacts

7. Traffic from the West of Ifield, wishing to avoid delays on Crawley’s main roads, could exit the site at the south-west onto the Rusper Road, and take the back route to join the A264 at Faygate or the A24 at the Bohunt roundabout. Neither Faygate nor Rusper is suited to take more traffic without compromising safety, the fabric of heritage buildings, and the quality of conservation areas. Homes England draws attention to two exit/entrances: one from the CWMMC to the north, and one at the bus/emergency vehicle entrance in the south. We are aware that many readers have missed that there is a third exit onto the Rusper Road going west towards the village of Rusper^{6, 7}.
8. Charlwood, and other villages in Surrey such as Leigh and Betchworth, would experience similar impacts as drivers take country routes going towards south-west London that avoid main roads.
9. A disregard for heritage is evident in specifying a road through Ifield Village Conservation Area (IVCA) for the traffic diverted from the closure of Rusper Road, without mentioning that it is in the conservation area. The related traffic impacts are dealt with in the heritage section. The negative impact on landscape and heritage of the large-signalised junction where the CWMMC meets Charlwood Road/Ifield Avenue, Bonnetts Lane and Ifield Green would be much more severe than Homes England acknowledges. Again, this is dealt with in our section on heritage.
10. The negative impact on the neighbourhood of Ifield West whose traffic exits at the Hyde Drive roundabout is hardly mentioned but the closure of Rusper road going west is not without drawbacks. Accidents, or a fallen tree on the stretch of Rusper Road from the Hyde Drive roundabout to Tangmere Road leaves Ifield West with no exit. The same problem will of course arise for those in the newly formed southern cul-de-sac on Rusper Road.

⁵ https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=CC0216259E654CAC8C7C06845987377F

⁶ Supporting Statement: Summary of Proposed Rusper Road Changes for Land West of Ifield Application
https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=9B4E419D86D64EE9994C904373E3322A

⁷ Latest plan: Phase 1A general Arrangement 1 of 7 10051123-ARC-010-18-DR-HE-00001, REV P05
https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=19F527EAC42E41829688C73C5F6C6794

Safety of road-users and pedestrians

11. The southern route for Phase 1 construction traffic from the A23 planned to be via Gossops Drive, Overdene Drive, Ifield Drive, Tangmere Road, and Rusper Road is of particular concern. The Overdene Drive/ Ifield Drive/ Tangmere Road junction is a known traffic hotspot, exacerbated by its being the location of The Mill Primary School and Ifield Station. Delays at this junction can be as long as 10 minutes often occasioned by the no 2 buses stopping there and blocking the road. Large lorries can be seen doing a three point turn to navigate entering Tangmere Road from Ifield Drive. The stretch of Rusper Road from Tangmere Road to Hyde Drive is not designed for heavy vehicles because of its narrowness and the narrowness of the pavements. WSCC has also raised this as a concern.
12. Once the CWMMC becomes usable then construction traffic can enter the site from the north via Ifield Avenue and the Charlwood Road. While this route does not directly involve small residential roads like Tangmere Road it still raises serious questions about safety, and providing an environment conducive to cycling and walking, over the 15 year construction period. The construction traffic will pass immediately beside a primary school playground, multiple bus stops, and pavements heavily used by pedestrians. Will cycle paths be provided along the entirety of Ifield Avenue, as part of Phase 1 construction? We also note that an application to increase HGV movements along Charlwood Road was turned down at appeal⁸ due to concerns about its rural nature, and potential highway safety issues.
13. Homes England has stressed the importance of the proximity of West of Ifield to Ifield Railway Station, but the station is already dangerously over-crowded at peak times, as shown clearly in our short film⁹ (90 seconds). Ifield Station has short (5 carriages long), narrow platforms, a poor service, no car parking and is not reached by any cycle paths (there is one path from West Green but it ends when it reaches Ifield Drive.).
14. The station's short and narrow platforms are often overcrowded at peak times, forcing commuters to walk outside of the 'yellow line'. Its placement, abutting residential and commercial properties, Ifield Drive and Craigans (Road), and with the Overdene Drive bridge over the railway to the east, would make extending platforms problematic and expensive. This mitigation has not been proposed. Moving from one platform to another is only by a footbridge, difficult for people with limited mobility. The proposed improved waiting area of Platform 1 (towards London) might marginally improve safety for passengers if it can be enlarged, but no details are given of what is proposed. Increased cycle parking at the station might encourage cycling, but traffic problems at the junction by the station would discourage it. 'Public realm' improvements are promised but non-specific.
15. Pedestrian safety has been mentioned above related to several locations. We draw attention here to two sections of Rusper Road: a) from the bus gate to Hyde Drive and b) from Hyde Drive to Tangmere Road. In a), pavements are narrow and non-existent on one side near the junction with Hyde Drive. Mitigations on this section involve chicanes and enlarged waiting areas to allow buses to pass, but pavements will still be narrow. In section b) pavements are narrow. In both cases a) and b) see heavy pedestrian traffic especially at school start time, parents with pushchairs vying with the general public.



In conclusion

16. Collectively, Homes England's documents imply an over-reliance on desk-based assessments with only limited visits to experience the reality of the transport issues.

⁸ WSCC/081/19 <https://westsussex.planning-register.co.uk/Planning/Display/WSCC/081/19#undefined>

⁹ <https://youtu.be/-9ck8lQIQEg>