

Transport for the South East (TfSE)

By email only: tfse@eastsussex.gov.uk

12 September 2022

Dear Sir / Madam

Horsham District Council's Response to the Transport for the South East's Consultation Draft Strategic Investment Plan for the South East of England

Thank you for the opportunity to comment on the Transport for the South East (TfSE) Strategic Investment Plan (SIP) for the South East.

Introduction and Context

Following the publication of its Transport Strategy in 2020, Horsham District Council (referred hereafter as HDC or 'the Council') understands that the introduction of this draft Strategic Investment Plan for the South East of England is intended to provide a framework for investment in strategic transport infrastructure services and regulatory interventions to 2050.

Horsham District is located centrally within the South East in the county of West Sussex and covers an area of 530km² (205 square miles). It is predominantly rural in character, containing a number of smaller villages and towns, with Horsham town being the main urban area in the District. In terms of the TfSE geographic areas, Horsham District is within the '**London to Sussex Coast**'¹ region and therefore, the package of interventions in this location is of most interest and relevance to the Council.

Given the District's rural nature, car ownership and use are high. It is recognised that there is an existing transport infrastructure deficit, which requires wider infrastructure investment to reduce unresolved and ongoing congestion issues, rail overcrowding and slow journey times. The Council is therefore very supportive of the work that TfSE is undertaking to develop a Strategic Investment Plan for the South East region.

Horsham Transport Study

HDC is currently working on the emerging Horsham District Local Plan (HDLP). To support this work, the Council commissioned the Horsham Transport Study² to assess the impact of a number of development scenarios on the local highway network above baseline growth. The modelling work is also used to inform the mitigation strategy required to support the Local Plan.

¹ Previously referred to by TfSE as the South Central Radial Study Area

² [Horsham Transport Study \(May 2021\)](#)

Whilst work on the strategy and transport outcomes remains subject to change, to date physical mitigation has been identified for four junctions on the A24 corridor plus a range of other measures to address impacts across a variety of junctions throughout the district.

Sustainable transport measures have also been identified in the Transport Study which seek to minimise the need to travel and to maximise sustainable modes. For the strategic-scale sites tested in the Transport Study, key site-specific measures have been identified including increased bus frequency, bus priority measures, pedestrian and cycle connectivity and other transport package measures such as Transport on Demand, Micromobility and Mobility as a Service (MaaS), amongst others.

Packages of Interventions: London to Sussex Coast

The London to Sussex Coast sub-region covers the key corridors between London and the Sussex Coast conurbation (from Chichester to Eastbourne) and focuses on interventions in East Surrey, West Sussex and East Sussex. TfSE has developed five packages of interventions for this area and of the various schemes which are detailed on p.52 of the Consultation Document. The interventions that are likely to have the most tangible impacts on Horsham District³ are as follows;

Rail Packages	Mass Transit	Highways	Active Travel
Map Ref. J5 Arun Valley Line – Faster Services	Map Ref. L1 Fastway Extension: Crawley – Horsham	Map Ref. N8 A264 Horsham - Pease Pottage Carriageway Enhancements	Map Ref. M5 Horsham Local Cycleways
Map Ref. J8 New Station to the North East of Horsham	Rural Bus Corridor Service Enhancements: A24 (Map Ref. L7) A272 (Map Ref. L10) A264 (Map Ref. L11) A29 (Map Ref. L12) A283 (Map Ref. L13) A281 (Map Ref. L14)	Map Ref. N10 Crawley Western Link Road and Cycleway	Map Ref. M10 West Sussex Inter- Urban Cycleway
		Map Ref. N13 A24 Corridor Improvements Horsham to Capel (LLM Pipeline)	Map Ref. M12 New Crawley – Chichester National Cycle Network Corridor

HDC is generally very supportive of all the proposed interventions. However, we do have specific comments we wish to make on the proposals.

³ It is, of course, acknowledged that a variety of transport interventions outside of the District will also have an impact on traffic and sustainable transport movements

London – Sussex Coast Rail Packages

We welcome the proposed interventions for improved rail services on the Arun Valley Line (Map Ref. J5) and a new railway station to the north east of Horsham, between Horsham and Crawley stations (Map Ref. J8). As TfSE will likely be aware, the strategic allocations Land North of Horsham and Land West of Bewbush (now more commonly referred to as Kilnwood Vale) have land safeguarded for the delivery of new parkway stations.

Network Rail, the DfT, the Coast to Capital LEP and the Local Authorities are working collaboratively to investigate the feasibility of introducing new stations on the Arun Valley Line. However, at this stage, the delivery of even one new station along this section of the line is uncertain owing to concerns around the impact on journey times. We understand, from details contained within Table 5.1 of TfSE's *South Central Radial Area Study: Options Assessment Report (Version 2.0, Oct 2021)*, that "faster line speeds" have been concluded as "parked" and "fewer stops" has been assessed to "proceed". Whilst the Council is supportive of improved services on the Arun Valley Line, the proposals for fewer stops will need further consideration and more detailed work including consultation with key stakeholders and affected communities.

In response to questions around the potential for new stations to serve the area, Network Rail's West Sussex Connectivity Modular Study⁴ recommended that a wider whole-transport system assessment should be undertaken with TfSE to review how the local railway serves its communities as part of wider transport connectivity. Whilst the Council is very supportive of aspirations to deliver improved services along the Arun Valley Line and a new station to the north east of Horsham, we consider that more detailed work by TfSE, in collaboration with key stakeholders, will be necessary to deliver these interventions. From the details contained within the draft SIP, and the associated evidence base, it is currently difficult to see how these shared aspirations will feasibly be progressed to deliver rail upgrades on this part of the Arun Valley Line, given the issues already identified. It is therefore essential that further work is undertaken to support the delivery of these interventions, and we urge TfSE to demonstrate strong leadership and commitment to resolving the current issues that are hampering these much-needed rail upgrades.

London – Sussex Coast Mass Transit Interventions

HDC is very supportive of the proposed measures to improve bus services in Horsham and connectivity with Crawley and Gatwick Airport (Map Ref. L1), alongside rural bus service enhancements along key A roads within the District (Map Ref's L7 and L10-L14).

The bus rapid transit (BRT) Fastway service linking Crawley with Gatwick Airport and Horley is widely recognised in the region as a success story, designed to speed past congestion hotspots using guided busway and dedicated bus lanes. Proposals to extend the Fastway service between Horsham and Crawley are therefore welcomed and very much supported by the Council. Given the extent of development that is coming forward as part of the existing Horsham District Planning Framework and may come forward as part of the emerging Horsham District Local Plan, mass transit services in this location have the potential to support both existing and

⁴ [P.30, West Sussex Connectivity Study \(Spring 2020\), Network Rail](#)

new communities and enhance more sustainable travel-to-work options. HDC would be pleased to work collaboratively with TfSE in any feasibility, planning and implementation work that is required to deliver mass transit services in this location.

Owing to decreased funding from central Government and competing pressures on public finances, rural bus services in West Sussex have experienced numerous cuts in services in recent years with these impacts affecting a variety of routes within Horsham District. Enhancements to rural bus services connecting the settlements in the District via the A24, A272, A264, A29, A293 and A281 are therefore very much welcomed, particularly given the high reliance on car use within the District. HDC would welcome the opportunity to work with TfSE and West Sussex County Council, as the highways authority, to support improvements on these corridors. Opportunities for bus priority measures, in a number of locations, have been identified by West Sussex County Council and in the Horsham Transport Study and we are keen to ensure these improvements are delivered.

London – Sussex Coast Highways Interventions

HDC is supportive of the proposed highways interventions, elements of which have already been identified by the Council in its emerging Local Plan work, in particular, delivery of the Crawley Western Link Road and carriageway enhancements on the A264.

Subject to the level of development which is allocated for development within the Horsham District Local Plan around Crawley, together with proposed expansion at Gatwick airport, it is envisaged that a full Crawley Western Link Road and multi-modal corridor will be required to mitigate the impact of wider traffic growth in and around Crawley and the A264 is the main connection between Horsham and Crawley which is becoming increasingly congested. Additionally, there are shared aspirations between Horsham and Crawley Councils and West Sussex County Council to see improvements that will enhance sustainable travel, including walking and cycling opportunities and provision for bus priority measures along this route.

A24 Interventions

We are surprised to see that only those interventions in the section of the A24 north of Horsham town to Capel in Surrey have been identified and not those further south along the corridor between Worthing and Horsham. The Council has had regard to TfSE's *South Central Radial Area Study: Options Assessment Report (Version 2.0, Oct 2021)*, published as part of the supporting evidence base.

In Table 5.5 of the report support for *Package 4* for improvements at the northern end of the A24 between Leatherhead and Horsham have been identified. TfSE's Options Assessment process scored each transport intervention based on its alignment with national, local and regional policy. It is noted that online improvements and grade separation for the A24 between Findon and Horsham have been concluded as 'parked' (as opposed to 'proceed'). This does not seem to align with the priorities and transport strategy set out in the West Sussex Transport Plan⁵. This conclusion is also not reflective of the stakeholder engagement work that West Sussex County Council has been undertaking on both sections north and south of Horsham on

⁵ [West Sussex Transport Plan: 2022 to 2036](#)

the A24 corridor and in which Horsham District Council has been actively responding and supporting.

The feasibility work that West Sussex County Council has been progressing consider improvements on the A24 between Worthing to Horsham and between Horsham to Dorking. HDC is supportive of measures along both sections of the corridor which aim to address highway related transport issues across modes, support strategic development and economic growth. It should be noted, however, that the A24 Worthing to Horsham feasibility work is more progressed with the A24 Horsham to Dorking work currently at an early stage.

The rationale for choosing not to proceed with improvements in the section of the A24 south of Horsham is unclear. As part of the Options Assessment, each intervention was examined through three assessments. The first focused on strategic and policy alignment, the second on economic impact (using DfT's EAST framework) and the third on deliverability.

For the A24 Findon – Horsham interventions “Online Improvements” and “Grade Separation” were assessed and both concluded to be “parked”. All of the assessment scores for “Online Improvements” were found to have medium or high alignment with the three assessment measures, with the exception of the “Strategic” assessment which was found to have low alignment. As identified earlier in this response, HDC considers that this conclusion does not seem to align with the WSCC Transport Plan. Additionally, the Horsham Transport Study has identified that upgrades along this corridor are necessary to support future development, therefore it is considered that this has been insufficiently assessed in the TfSE Options Assessment process and should be found to have a higher alignment with “Strategic” objectives. This is key in order to reflect the importance of the A24 as part of National Highways’ Major Road Network (MRN) and County’s Strategic Road Network, recognising its economic and strategic importance to the District and wider region.

A29 Enhancements

It is noted that, similar to the A24 Findon to Horsham interventions, the A29 Enhancements, including online improvements between Billingshurst and Pulborough, have also been concluded as “parked”, which HDC finds disappointing, particularly given some of the issues currently experienced along this corridor. It is noted that the New Crawley – Chichester National Cycle Network Corridor (Map Ref. M12) is proposed as a potential Active Travel Intervention. Given that the A29 is one of the principal roads connecting the urban settlements between Crawley and Chichester it is assumed that the Cycle Network will be along or adjacent to this route. There are also proposals for improvements to rural bus services along the A29 as part of the TfSE proposed interventions. It would therefore seem logical that upgrades to enhance travel along the A29 across different modes would be better considered holistically.

East – West Highways

The Draft SIP identifies one of its Global Policy Interventions as “*Transforming east – west connectivity*”, stating a key objective is to enhance east – west corridors to the same level as radial links to and from London to boost connectivity between major economic hubs.

The Council is therefore surprised that TfSE proposes little support for interventions along the A272 which is a key route spanning the counties of East Sussex, West Sussex and Hampshire. It is one of the main corridors in the District and traverses east - west through the whole District.

The Council has had regard to the TfSE's *South Central Radial Area Study: Options Assessment Report (Version 2.0, Oct 2021)* and notes the information and assessment on the East – West Highways in Table 5.9. There appears to be some confusion in some of the details relating to the A272 and the Crawley Western Link Road. Firstly, the Crawley Western Link Road does not actually relate to the A272, rather it is proposed to connect to the A264 at Faygate and to the A23 south of Gatwick Airport and north of County Oak. Secondly, it is a proposal that West Sussex County Council, as the local highways authority, is developing, in partnership with Horsham District and Crawley Borough Councils, not Surrey County Council.

Turning specifically to the A272, all of the potential options for improvement of the A272, both within Horsham District and in the neighbouring authority area of Mid Sussex, have been concluded as 'parked'. This therefore means that there are no proposals for Highways Interventions on the A272 within the London – Sussex Coast region, which the Council suggests does not seem to align with the wider Global Policy Intervention for improving east - west connectivity.

Further to this, it is noted on Table 5.4 of the TfSE's *South Central Radial Area Study: Options Assessment Report (Version 2.0, Oct 2021)* that the A272 / A283 AQMAs (Cowfold, Storrington, Pulborough) have been assessed as 'proceed' and on Table 5.9 of the same assessment the A272 Cowfold Bypass has been assessed as 'parked'. It is then not clear from the main list of interventions for the London – Sussex Coast Region what interventions are proposed to support these AQMA areas.

M23/A23 Interventions and Issues at the A2300 Junction

Whilst the M23/A23 corridor lies outside of Horsham District it is acknowledged that any new development in Horsham District will, in cumulation with development in neighbouring authority areas, have an impact on this important corridor which forms part of the National Highways Strategic Road Network (SRN). Many of the district's roads feed directly onto the A23 and therefore the SRN provides connectivity for the district's residents travelling to key locations including London, Brighton & Hove, and Gatwick Airport. Therefore, investment in key junctions is recognised as being important to our residents and businesses which rely on good accessibility for their continued success.

The Horsham Transport Study (para 7.4.2) and para 8.5.2 in particular, highlight that the particular junctions which are most likely to be impacted (the A2300 junction) and that much of this growth will be generated by growth outside HDC. The study highlights that the need for junction enhancements is therefore a strategic matter that individual Local Plans have a limited ability to deliver the total mitigation required on an individual basis. This is in spite of considerable efforts being made through local plan policies and spatial strategies to minimise reliance on private car use. As such, we ask that account is taken of the likelihood of greater pressure on this junction as part of the package of interventions for the M23/A23 corridor. Addressing these issues must be undertaken at a strategic level as the cumulative growth at a

sub-regional scale will require cross-boundary working and co-ordination to identify the appropriate solutions and the necessary funding.

London – Sussex Coast Active Travel Interventions

As with all of the identified interventions that are contained within Horsham District, we are very supportive of the proposed Active Travel measures that would have a positive impact on sustainable travel within Horsham District.

Development of Horsham Local Cycleways is welcomed and would build on the work that the Council, in collaboration with West Sussex County Council, has been undertaking. The Council adopted its Horsham Local Cycling and Walking Infrastructure Plan (LCWIP)⁶ in October 2020 and proposes improvements to six key corridors in and around Horsham with further connectivity to adjoining villages. Further work is being undertaken by the Council to understand the broad scale of funding that might be required and consideration of the works, site clearance, signs and markings, lighting, public utilities, testing, surveys, design and supervision fees. The Council would be pleased to share any emerging findings that would support the Feasibility Study as part of the SIP's 'Next Steps' and to help build a stronger case for delivery of this key infrastructure which is very much needed to support Active Travel in and around Horsham town and its adjoining villages.

At this stage, there appears to be limited information on what a West Sussex Inter-Urban Cycleway (Map Ref. M10) would look like. Providing cycling connectivity between urban settlements, such as Horsham and Crawley is welcomed, however, the proposals need to be considered in the round i.e. alongside aspirations for the Crawley Western Link Road and bus service and carriageway enhancements for the A264 as the connecting corridor between the two settlements. Such a joined-up approach will help to ensure that any investment is focused effectively preventing conflict between the various transport modes and helping to create the optimum environment for safe and efficient travel for all users.

Other Regional Interventions

Whilst the interventions discussed above will have the most direct and tangible benefits for Horsham District, there are proposals beyond Horsham District that will benefit residents, employees and visitors. Most notably, the interventions proposed as part of the Sussex Coast package along the A27 (for example, Map References I3, I20 and I21) would all be considered to result in positive effects in Horsham District.

We recently responded to National Highways' Statutory Consultation on its application for Development Consent for the A27 Arundel Bypass. We support this scheme as there are significant problems from the many drivers wanting to travel between Fontwell and Shoreham choosing a route that takes them via the district's southern villages of Amberley, Storrington, Washington and Steyning to avoid the inevitable delays and congestion on the A27. This 'rat running' is a significant contributor to poor air quality in Storrington (and which TfSE is aware is an AQMA) where some 18,000 vehicles a day pass through the village High Street. Rat running also occurs via Pulborough and Coldwaltham. Therefore, any measures that improve travel

⁶ [Horsham District Local Cycling and Walking Infrastructure Plan \(2020\)](#)

along the A27 will reduce the negative impacts experienced in more rural areas that adjoin it and we express our support for these interventions.

Investment Considerations

The Council has had regard to the packages of interventions that have been put forward at the sub-regional level, which purely in financial terms can be summarised as follows;

Sub-region	Packages of Interventions	Total Expected Capital Investment	Additional Economic Value Each Year by 2050
Solent and Sussex Coast	Nine	£11.8 billion	£1.3 billion
London to Sussex Coast	Five	£3.6 billion	£0.6 billion
Wessex Thames	Three	£10.4 billion	£1.2 billion
Kent, Medway and East Sussex	Seven	£19.4 billion	£0.75 billion

The London to Sussex Coast area covers the key corridors between London and the Sussex Coast and the interventions proposed within East Surrey, West Sussex (in which Horsham District is located) and East Sussex.

It is acknowledged that the four broad sub-regions do experience some crossover, with, for example, interventions for East Sussex contained within the London to Sussex Coast package of interventions, but also those for the Kent, Medway and East Sussex region. Nevertheless, the proposed investment for the London to Sussex Coast sub-region is considerably lower than that proposed for the other three regions.

Given it has been identified that the ‘Next Steps’ for all the proposed interventions within Horsham District (contained within Table A.1 of the Consultation Draft) will require Feasibility Studies, the Council is concerned that much needed transport upgrades in this rural district and other parts of the London to Sussex Coast area may fall away if there are constraints or challenges that deem the schemes cannot be progressed. This has the potential to further decrease the overall investment in this region. There is concern that any lower rate of investment will continue to exacerbate some of the issues that the more rural parts of the South East, such as Horsham District, already experience. The Council therefore seeks assurances from TfSE that sufficient consideration is given to the next stages of the SIP to ensure that there is some form of parity between the different regions and local authority areas and that the more rural parts of the South East do not lose out in favour of schemes that are potentially ‘easier’ to deliver in urban areas.

Land Use Planning and Transport Planning

In the Chair’s Introduction on p.6 of the Consultation Draft, the vision incorporates the need for “*more joined up planning, particularly between transport and housing*”. The Council questions

whether this has been borne out fully in the proposed SIP and the associated interventions, given the level of investment proposed for different sub-regions.

As TfSE will be aware, that the government's aspiration is to significantly boost the delivery of new homes. Under current planning guidance, the current housing target for Horsham District is 948 homes a year. Local Authorities are also obliged to consider whether they have any potential to accommodate the housing needs from other nearby District's and Boroughs if they are unable meet their own needs. Many of the local planning authority areas in the South East of England are significantly constrained, affected by a variety of important designations and geographical constraints. Most recently, Horsham District and other authorities have been made aware of the impact of new development and the increased demand for water on the Arun Valley SPA. This now requires that our new Local Plan be Water Neutral (and not increase the demand for water above existing levels)⁷. Going forward it is envisaged that this may impact on the level of development that can be accommodated in the area in the short to medium term in particular. This is in addition to the other key designations in the South East such as National Parks and Areas of Outstanding Natural Beauty (AONB) and Green Belt.

In the TfSE Delivery Plan 2022 (p.16) it is acknowledged that a key challenge for the London - Sussex Coast region is housing development in the Gatwick Diamond area, whilst also acknowledging the planning constraints that exist in this area. Whilst TfSE have acknowledged where development is potentially coming forward and the planning constraints that exist in this region, HDC would like to understand the extent of the work TfSE has undertaken to properly interrogate how development is likely to come forward and when. This will now also need to take account of the outcomes of the issues of Water Neutrality in due course. It is, however, expected that some areas will be able to accommodate higher levels of growth than others and at different times. To properly achieve "*more joined up planning, particularly between transport and housing*" there needs to be a mechanism that recognises those local authority areas that are less constrained and are being required to deliver increased development. This will help to ensure that the development coming forward is supported with the appropriate investment in transport infrastructure. The Council therefore suggests a pragmatic approach in terms of funding proposed interventions, attaching some form of prioritisation assessment to incorporate a more granular analysis of where development is anticipated to be coming forward and how investment in transport infrastructure can support this work.

Development in Horsham District

Further to the comments made above, HDC would welcome the opportunity to work with TfSE to provide more detailed information on the development coming forward as part of the current Local Plan, the Horsham District Planning Framework, and in due course the emerging Horsham District Local Plan, which will cover a Plan period to 2039.

The Council has reviewed Appendix C (p. 153 - 4) of TfSE's *South Central Radial Area Study: Evidence Base Report (Version 3.0, 13th May 2021)* and we note that there are a number of inaccuracies regarding the development identified in relation to Horsham District. Kilnwood Vale, which has been referred to for the major economic hub of Crawley/Gatwick is a development within Horsham District (albeit it forms a new neighbourhood on the boundary of

⁷ Further information on Water Neutrality can be found on HDC's [website](#)

Crawley). The report suggests 1,200 homes in this location, but total development in this location is for up to 2,750 homes.

For the major economic hub of Horsham, the report suggests the main location of housing growth is the town centre and refers to a development of 203 homes at St Marks Court (please note – this has been replaced with a new permission for 148 dwellings). This appears to underestimate the level of development that is coming forward within Horsham District. One of the main locations for development is Horsham, although it is not the town centre. Land North of Horsham is a strategic allocation in the Horsham District Planning Framework and has outline planning permission for 2,750 dwellings, a 46,450m² business park plus other leisure and community facilities, including new schools. However, significant development is also coming forward in other parts of the district, most notably in Southwater (permission granted for 600 dwellings) and Billingshurst (circa 500 dwellings nearing completion), but also other key sites in and around Horsham town, including 1,044 dwellings in Broadbridge Heath and 1,090 dwellings to the west of Horsham. Given that there appears to be some inaccuracies in the information relating to Local Plan development in the District there is some concern that TfSE may have potentially under-estimated the scale of development and we query whether this has had implications in the Options Assessment i.e. whether projects are chosen to be ‘parked’ or proceed’ e.g. the lack of support for interventions along the A24 corridor between Worthing and Horsham.

The Council also notes that Appendix B (p.151) of the *South Central Radial Area Study: Evidence Base Report (Version 3.0, 13th May 2021)* details “*Planned Dwellings (Up to 2050)*”. Horsham District Council is currently working on the Horsham District Local Plan that will cover a Plan period to 2039, alongside many of our neighbouring authorities, with Local Plan Reviews currently being undertaken over broadly similar Plan periods. It would be useful to understand how a projection of planned dwellings to 2050 has been achieved. It would also be helpful to understand how development coming forward as part of emerging Local Plans in the region are being taken into account in the work TfSE has been undertaking.

The Council would be pleased to work with TfSE to ensure that the information relating to planned and emerging development, including detailed trajectories for delivery, is robust and up-to-date.

Financing the Strategic Investment Plan

It is identified in the Draft SIP (p.82) that there is a strong case for seeking “*new and innovative tools that seek to monetise a share of the specific value that projects deliver for beneficiaries and supplement or (eventually) replace traditional central government grant and local farebox for certain types of interventions.*” As has been identified, there are increasingly competing priorities constraining the financial positions of traditional funders alongside national-level challenges affecting the transport sector. The Council is therefore supportive of innovative approaches that support the delivery of much needed transport infrastructure, however, there is limited information available at this time on what types of tools would be used and which schemes this would impact.

Later in the section of the Consultation Draft SIP on Funding and Financing, it is suggested that “*innovative new funding mechanisms will form part of future funding deals for major transport*

interventions” continuing to describe those mechanisms that play such a role in the future delivery of the SIP include *“the diversion of incremental revenues from existing taxes or charges in specified locations, e.g. the CIL, Business Rates, Council Tax or Stamp Duty”*.

The pandemic has had a significant impact on local authorities, both in terms of the services they are able to provide, but also the increased financial burden that the pandemic has placed on already stretched local authority finances. There is increasing demand for services, which many local authorities are struggling to meet. The Council queries how realistic it is to apportion the incremental revenues from Business Rates and Council Tax as potential additional funding sources for delivery of the SIP. Additionally, revenue from the CIL may be available as a potential funding source where there are shared aspirations for delivery, but of course, these projects will be competing with other key infrastructure priorities such as the delivery of education and health services, amongst others. The interventions will be subject to the priorities of the awarding CIL spending body and cannot necessarily be relied upon.

With reference to how funding may come forward in the future, p.83 of the draft SIP states that *“the continued existence of a centralised funding regime for most types of strategic connectivity interventions suggests that many of the programmes within the SIP will continue to be funded, at least in part, from central sources.”* The Council questions whether using historical trends to provide some indication of future funding sources from Government can necessarily be relied upon, given the current Government’s levelling up agenda. This should be kept under review.

The Draft SIP also identifies a broader trend for ‘growth deals’ with Government whereby investment packages go beyond transport to housing delivery, for example unlocking match funding or other revenue-raising opportunities. Again, the Council questions how this sits with the current leveling up proposals to scrap the ‘80/20’ rule which currently sees 80% of government funding for housing supply being directed to London and the South East. Therefore, the opportunities for unlocking additional match funding for transport interventions as part of a wider opportunity area may shift over time. The Government’s levelling up agenda comments that it can *“relieve pressures on public services, housing and green fields in the South East”* thereby potentially indicating that there will be less development in the South East region than has been experienced to date.

In conclusion therefore it will be critical for TfSE to consider the wider implications for the SIP and how the proposed interventions will be funded.

Conclusions and Key Actions

Overall, the Council supports the work that TfSE has undertaken on the emerging Strategic Investment Plan and we share the vision for the South East region that has been formulated in the 30 year Transport Strategy and the accompanying Vision Statement.

As part of the next stage in the development of the Strategic Investment Plan, Horsham District Council would encourage TfSE to undertake the following:

- Expand the identified *Corridor Improvements for the A24 (Map Ref. N13)* to include the Worthing to Horsham section of the corridor

- Demonstrate leadership and commitment to resolving the current issues hampering the delivery of improved services on the Arun Valley Line and delivery of a new station to the north east of Horsham, ensuring that every effort is made to progress the work required beyond the feasibility stage
- Ensure that the relevant local planning and highway authorities are consulted from an early stage in the proposed feasibility studies for each of the proposed transport interventions. There exists a supporting planning evidence base plus ongoing project work that councils are undertaking that will contribute positively to the necessary studies
- Expand the proposed interventions for the M23/A23 SRN corridor to include support for measures to address increasing pressure on the A2300 Hickstead junction and in particular the southbound slip road onto the A23
- Give further consideration to how proposals across different modes can be delivered more holistically along the A29
- Reconsider whether interventions on the A272 can be progressed to better align with the Global Policy Intervention of improving east – west connectivity
- Provide assurances that sufficient consideration will be given to the next stages of the SIP to ensure that there is some form of parity between the different regions and local authority areas and that the rural parts of the South East do not lose out in favour of schemes that are 'easier' to deliver in urban areas.

Thank you once again for the opportunity to comment on this consultation. If there are any questions regarding our response, or you would like the opportunity to discuss any of the issues raised in more detail, please do not hesitate to contact Carol Algar, Senior Planning Officer, in the first instance, by emailing Carol.Algar@horsham.gov.uk or calling 01403 215398.

Yours faithfully,



Catherine Howe
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