

Horsham District Council's Response to the Draft West Sussex Transport Plan 2022-2036

Thank you for the opportunity to respond to the Draft West Sussex Transport Plan (WSTP) 2022-2036. We have chosen to dispense with responding to the survey questions, preferring to provide comments direct on the Draft Plan itself. The Draft Plan has been carefully considered and presents a clear high-level strategy. The following observations are shared by way of constructive feedback:

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	General Observations	The Figures (maps) that are contained at the end of the document would be more useful contained within the main Plan
2	2.1	As we have highlighted previously, the fourth bullet point 'Development and Regeneration Pressures' should be renamed to include 'and opportunities' as this should reflect the potential benefits that strategic/large-scale development can bring (enhancements to public transport services, pedestrian/cyclist infrastructure, highways safety enhancements). The 'key issue' element to this is that the potential benefits need to be sought and captured within the <u>planning/local plan process as they won't be delivered without it.</u>
2	3.3	Please amend to full titles to include designations "South Downs <u>National Park</u> , High Weald <u>Area of Outstanding Natural Beauty</u> and Chichester Harbour <u>Area of Outstanding Natural Beauty</u> ".
3	4.6	Small typo on the 6 th line – "by use of using..." suggest deletion of "by use of"
Executive Summary		
5	Section on 'Area Transport Strategies (Horsham)'	It is considered that there should be capacity to update/review the Horsham strategy given the timing of the draft WSTP, given Horsham District Council's Local Plan Review and timetable for publication of the Regulation 19 (and associated Transport work / IDP) as this will lead to additional transport priorities. In particular, once a development strategy for Horsham is confirmed, there are likely to be mitigation interventions which address specific growth areas e.g. strategic sites – this will have a significant bearing on geographical priorities and generate developer funding which focus on those areas.
5	5.5	It is considered that LCWIP implementation should be given greater recognition in this section – e.g. place bullet 5 further up the list and amend to state "deliver cycle priority routes <u>towards implementation of the Horsham LCWIP</u> "

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5	5.5, 2 nd bullet point and paras 7.95 to 7.100	Paragraph 7.95 states: <i>“Our transport strategy for Horsham in the short term is to deliver improvements within existing highway land to provide bus priority at signal-controlled junctions and deliver small scale ‘tactical’ highway improvements on A24 and A264 as development comes forward.”</i> What does ‘tactical’ mean in this context? Does this reflect the more significant junction updates which will be required to deliver the level of development the District is required to deliver? (i.e. the six junction improvements flagged in the bullet points under para 7.94). Enhancements will be required to deliver development coming forward as part of the emerging Local Plan – can this be captured in the Area Strategy?
5	5.5, 3 rd bullet point	What is the rationale for selecting Colgate and Rusper? In the Council’s settlement hierarchy these are lower tier settlements. What about other larger villages in the District such as Storrington, Steyning, Henfield and Pulborough?
5	Transport strategy for Horsham	In addition to the comments on these bullet points above, it seems that the transport strategies for some of the other Districts and Boroughs appear more ambitious than those set out for Horsham. Other areas have ‘upgrades’ or ‘improvements in performance’ of key routes, whereas those for Horsham include ‘tactical’ improvements or ‘investigate’ or ‘consult’ on solutions. Given the scale of housing growth that the District is being required to deliver (including meeting some of the unmet need in neighbouring authorities), greater alignment in the strategy with the scale of growth cross the County should be forged. Consideration also should be given to the A29 through Horsham District (Slinfold to Coldwaltham, and especially on the Five Oaks to Pulborough stretch) in the transport strategy for the District.
6	5.5, 9 th bullet point	The draft WSTP does not include any specific measures aimed at air quality management areas. In addition to tackling use of inappropriate rural routes, reference should be made in the Executive Summary (and other parts of the Plan) to improving air quality in the Storrington and Cowfold AQMAs.
6	5.5, 10 th bullet point	The strategy should also include explicit support for future rail investment programmes (i.e. new stations). Even though there are identified capacity issues on rail lines serving the District, it should not mean that the local authorities are not ambitious about working with industry partners to deliver new rail infrastructure in the District, particularly given potential opportunities afforded by strategic development close to the rail network in the District.
7	6.1	It is noted that the 5-year action plan will be used as a mechanism to review priorities – will this apply to Area Strategies as well as Thematic?
7	6.3	Does this approach risk mitigation not being delivered on certain transport projects despite developer contributions having been made? This section should also recognise local authorities’ corporate policies and priorities as material - allocated development and funds already committed by developers for mitigation should carry weight too.
Main report		

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9	1.9	Regarding the reference to transport network issues that occur now or are likely to occur during the Plan period, it should be made clear that this takes account of committed development but also development allocated in current and emerging Local Plans.
9	1.10	Regarding the environmental qualities in West Sussex, the need to consider and, where appropriate, take account of emerging Nature Recovery Networks/Local Nature Recovery strategies should be recognised. Whilst it is acknowledged that the Environment Bill has not yet been enacted, there are likely to be strategies well underway before 2036. Request that explicit reference be made to nature recovery strategies as both a short/medium and long-term consideration.
10	2.4 'Key Economic Areas in West Sussex	Can this section reference the Appendix C figures as it is really useful to have a visual representation?
11	2.10	A visual reference of this would be helpful.
11	2.13, 5 th sentence	Financially supported by whom? WSCC? It might be useful to clarify here.
12	2.14	The reference to bus services being lost or reduced if not commercially viable seems to be a major risk to shared transport aspirations in the Plan as well as national policy requirements around public transport and local/national targets for net zero carbon emissions. It is suggested this be referenced explicitly in the Key Issues/Strategies part of the Plan i.e. how to ensure new services linked with development in order to build up custom early on to keep these viable
13	2.26	What are the five-year review periods of the Government's investment cycle? How do they sit alongside the life of this Plan and its five-year iterations?
13	2.27	Could these be mapped to aid visual understanding of the spread of vehicle charging infrastructure?
13	2.28	It is acknowledged that on most roads in West Sussex, heavy and light goods vehicles make up a small proportion of total traffic volume, it would be useful to understand if there any parts of the network that experience higher freight movements.
14	2.32	This section should reference expansion plans at Gatwick Airport and the potential for future impacts on the transport network, given the airport expansion is expected to be complete shortly after the end of this Plan. Whilst it is acknowledged that there is some uncertainty around GAL's Master Plan Scenario 2 growth proposals (the Northern Runway Project) as this has yet to go through the DCO process, the growth proposed under Scenario 1 of GAL's Master Plan does not need to go through any formal planning processes, therefore, subject to Covid recovery, this growth is anticipated to happen and should be considered as important context to / baseline for this Plan (the

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		Scenario 1 growth equates to some 15million passengers per annum and is therefore not insignificant, requiring greater consideration in this Plan).
15	3.2	Updates are required to the 'National Policy' section to reflect the revised NPPF – i.e. tree-lined streets and possible impact on local highways (para 73 requirements of “genuine choice of transport modes”). Citation should make clear which version of the NPPF is being referred to.
16/17	3.11	Referencing all the adopted local plans – this should also include an assessment of the direction those being reviewed are taking (for example there is a greater emphasis on sustainable transport in the emerging Horsham District Local Plan).
18	4.5-4.6 Section on 'Local Environmental Impacts'	This section is missing any reference to Local Nature Recovery Strategies and NRNs. Request that explicit reference be made to nature recovery strategies as both a short/medium and long-term consideration. These are seen as presenting opportunities rather than as constraints on development and change, but local strategies and NRN maps may present opportunities for authorities to require greater consideration of environmental / biodiversity impacts and mitigation and this could impact delivery of transport infrastructure.
20	4.14	Regarding the second sentence, it may be the case that developer-led schemes will address pre-existing issues as well as direct impacts, thereby providing a wider public benefit (albeit this of course cannot be insisted upon) – hence this statement could be more positive. Referencing the last sentence in this paragraph, it should make clear that there is also an opportunity to shape the habits and behaviours of residents in new developments by encouraging early use of shared transport modes (buses) which will help ensure these are viable when developer funding is exhausted.
20	4.16	Agreed that inactivity is due, in part, to the individual's travel choices, but it should be recognised here that this is also due to lack of travel choices available i.e. lack of safe routes to school via active travel modes, restricted public transport options meaning more likely to use private car to travel door-to-door than make first and last parts of journey on foot/bicycle.
22	4.24	The condition of walking infrastructure is not just down to poor repair or the like, but also the choice of materials which can make some surfaces inaccessible e.g. uneven, slippery materials by design (aesthetic over practicality) can restrict walking or the use of mobility aids.
24	4.33-4.38 Section on 'Shared Transport Services'	It is suggested this section mention the opportunities around development to help to sustain or make previously unviable services or routes (particularly rural but also urban) viable with a strategy put in place to encourage regular bus use early on in a development (i.e.. road layout designed to favour buses, bus services provided in earlier phases of a development, subsidised ticketing etc).
27	4.44	Whilst we agree somewhat with the reality of what is presented in this paragraph (particularly in light of the Arun Valley Line Study), it is considered that there is some conflict with the position we should be taking as local

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		authorities to be ambitious about supporting opportunities for new stations in the District in association with new development. It does appear difficult to deliver these facilities, but we should nevertheless, still set out our ambitions.
28	4.48	The sentence “ <i>the medium and long-term impacts of the Covid-19 pandemic on air travel are uncertain which could affect willingness to invest in surface access infrastructure</i> ” should be re-phrased. We (and other local authorities) urge a strong unequivocal position on the part of WSCC, which expects the necessary level of mitigation required to support Gatwick expansion plans and this sentence is critical at this early stage of planning for Gatwick’s future. The current wording may be read as a fait accompli and something that we may just have to accept – of course, the opposite of this is true and we will be pushing GAL to mitigate these impacts.
29	4.55	The last part of this paragraph, referencing potential opportunities to supplement developer contributions to deliver strategic improvements is key. Who is ultimately responsible for this planning and management over a five-year period? The WSTP should provide a clear steer as to appropriate mechanisms for addressing the impacts of development, indicate other potential strategic funding streams needed to ‘plug the gap’, and explain how the two might dovetail. Given the timing of our Plan, we are keen to understand how the contributions and improvements required in and round Horsham District will be incorporated?
31	5.4, 3 rd paragraph	This paragraph should be amended to include designations “South Downs <u>National Park</u> , High Weald <u>Area of Outstanding Natural Beauty</u> and Chichester Harbour <u>Area of Outstanding Natural Beauty</u> ”
32	5.11	Suggest inclusion of reference to the Gatwick expansion plans which has the potential to be positive for the wider West Sussex economy but also has the potential to impact road and rail movements around the County.
38	6.8, 7 th bullet point	This should be extended to include an assessment of shared transport prioritisation when consulted on planning applications (particularly larger scale proposals where there is an opportunity to implement new service if buses are convenient to access and use), thereby helping to ensure new residents have the opportunity to choose more sustainable travel modes rather than using the car as the default travel mode.
38	Section on ‘Short term (2022-27) shared transport priorities’	This section should reference working with local planning authorities to deliver some of priorities
40	6.11, 6 th bullet point and 3 rd bullet point under ‘Short term (2022-	These bullet points should reference the shared ambition for a new station on the Arun Valley Line, were a feasible and justified proposal to come forward

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	27) rail priorities	
43	Section on 'road priorities'	<p>Inclusion of the Crawley Western Link Road is strongly supported as a medium-term priority. The presentation of this as being developer-led in the West Sussex Transport Plan should be clarified to reflect opportunities the relevant local authorities might have to secure contributions from Gatwick expansion to this road infrastructure.</p> <p>The reference to the A29 realignment is noted in the short-term priorities. However, it is considered that further potential developer-led improvements for the A29 in Horsham District should be added in to the medium- and longer-term priorities depending on the strategy agreed for the Horsham District Local Plan.</p>
59-62	7.82-7.100 Section on 'Area Transport Strategy for Horsham'	HDC supports the overall strategy for Horsham District set out in this section, subject to the comments below. However, it is not clear what the approach is for delivering the schemes and measures referred to. Much of what is proposed focuses on improving sustainable travel modes along key corridors, however with the partial exception of the A24 corridor (covered in paragraph 7.94) the priorities appear not to be backed up with a clear mechanism for delivery. We would urge that a more specific Action Plan is developed at least for the short-term measures, to identify specific interventions along with timescales and resources needed, such that there is a clear path for identifying funding and partner buy-in.
59/60	7.87	It is considered that this paragraph could be more explicit about the scale of development Horsham District is being required to meet, given the Standard Housing Methodology and the requirements to work with neighbouring authorities to assist with their unmet need under the Duty to Co-operate. The quantum for development is a step change from the HDPF and it should be acknowledged that this will require investment in supporting transport infrastructure.
61	7.94	Depending what is agreed for the emerging Horsham District Local Plan, the potential mitigation for the following junctions accords with emerging evidence supporting the Horsham Local Plan (i.e. the Horsham Transport Study): A24/A272 Buck Barn, A24/A283 Washington Roundabout, A264/B2195 Moorhead Roundabout. However the Robin Hood Roundabout and Great Daux Roundabout, whilst potentially requiring future improvements to deal with background and cumulative traffic growth, are not likely to be required specifically to deal with the impacts of the Local Plan. On the other hand, locations not listed, and likely to require mitigation as a result of local plan growth, are A24/B2135 Steyning Road and congestion hotspots at Cowfold, Storrington and Pulborough. Furthermore, improvements are likely to be needed at many of these locations irrespective of how successful the sustainable travel strategy proves to be in future. We request that this paragraph is amended to reflect these points.
61	7.95	It would be helpful if you could elaborate on what 'tactical' highway improvements actually look like. Are they 'tactical' as there are no other options for greater improvements? This section also repeats what is on p.5 (para 5.5)

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62	7.96	As above – this section repeats what is on p.5 (para 5.5). Please see comments on the particular villages. Why are the villages different here?
62	7.98-7.99	There should be more detail on, and explicit support for, the early delivery of the Crawley Western Link Road. This will be a major new multi-modal corridor with an important strategic role for achieving the objectives of the WSTP in Horsham and Crawley.
62	Section on 'Short term (2022-27) priorities for the Horsham area, 5 th bullet point	What are the 'quick wins' referred to in bullet 5? What do these look like and are there any specific locations/situations that these can be achieved? HDC would welcome discussion on this to understand the detail behind the short-term priorities referenced in all of these bullets, and how these relate to the medium- and long-term growth anticipated in the District.
62	Sections on 'Medium term (2027-32) and Long term (2032-36) priorities	References to 'LCWIP priorities' should be expanded upon to be more specific.
73	8.2	We support the annual review as it acknowledges that major transport requirements can arise between these five-year reviews (Local Plans) and the Plan should include some flexibility particularly with reference to local projects/priorities
75	8.17	In light of Chichester District Council's recent announcement that it would not be able to meet its housing requirements as a result of the infrastructure improvements required to support the A27 and the lack of funding is a concern. This section should also acknowledge/take into account District's / Borough's local plans, IDPs etc.