

Rickman's Green Village - Phase 2

Planning Application Ref: 22/03131/OUTEIA
(Up to 492 dwellings and 2FE Primary School)

Further Objections on Highway and Transport Grounds

Plaistow and Ifold Parish Council

March 2024



1 INTRODUCTION

1.1 SW Transport Planning Ltd is instructed by Plaistow and Ifold Parish Council to provide advice in connection with the proposed redevelopment of Crouchlands Farm, Rickman's Lane, Plaistow. These representations respond to the Rickman's Green Village (RGV) Phase 2 planning application for up to 492 dwellings and a Two Form Entry Primary School (Ref 22/03131/OUTEIA).

1.2 The parish council submitted objections to the original planning application in June 2023. These "Further Objections" respond to new transport information submitted by the applicant, including:

Transport Assessment (TA) Annex A – Road Safety Report, dated 11 Sept 2023

Transport Assessment (TA) Annex B – Junction Modelling Report, dated 11 Sept 2023

Transport Assessment (TA) Annex C – Bus Service Technical Note, dated 25 Sept 2023

Environmental Statement (ES) Addendum, dated 18 Sept 2023

1.3 Annexes A and B of the TA were absent when the planning application was originally submitted and these documents contain entirely new information. The original ES was incomplete as it contained no Transport Chapter, this information is now included in the ES Addendum. Annex C of the TA has now been updated and supersedes the version submitted with the original planning application.

1.4 It is noted that the applicant's original TA report, (dated 23 November 2022), has not been updated. Our previous objections in relation to that document, concerning transport sustainability, transport strategy and parking strategy - as set out in our original Objection Report dated June 2023, therefore remain unchanged and should be read alongside these further objections.

2 TA ANNEX A – Off-Site Road Safety Report

2.1 Context

- 2.1.1 Annex A provides details of baseline injury accident data and applies a Star Rating Score (SRS) to all of the roads surrounding the site, using a methodology developed by the International Road Assessment Programme (iRAP). This enables each section of road to be allocated a Star Rating Score, from 1 to 5 based on a range of physical characteristics, with 1* representing the highest risk of death or serious injury and 5* the least dangerous.
- 2.1.2 The report then sets out a range of proposed highway improvements which seek to achieve a SRS of 3* or above.
- 2.1.3 Annex A also includes an Active Travel Assessment based on the Active Travel England (ATE) Planning Application Assessment Toolkit Checklist. This lists a range of considerations relevant to active travel including both on and off-site infrastructure and facilities, and on and off-site network conditions.
- 2.1.4 The key aspects of the analyses included in Annex A are discussed below.
- 2.1.5 It is noted that the new Annex A and Annex B documents deal with the RGV proposals as a whole and cover both the Phase 1 planning application for 108 dwellings, and the Phase 2 application for 492 dwellings and a Two-Form Entry Primary School.

2.2 iRAP Assessment Methodology and Results

- 2.2.1 The iRAP methodology seeks to define a numerical score for individual sections of road based on a wide range of physical characteristics including vehicle, pedestrian and cyclist flows; speed limits; carriageway width and condition; the presence or absence of footways or other pedestrian or cyclist facilities; roadside hazards (signs, trees, buildings); curvature, road markings and many more physical attributes. In total there are more than 60 characteristics which are individually coded to give a numerical score for each section of road, which then determines a star rating from 1 to 5 (with 1* representing the highest safety risk and 5* the lowest).
- 2.2.2 The process is applied to the baseline situation, without development, and a future scenario including the development and associated off-site highway works.
- 2.2.3 Inevitably the coding process relies on the judgement and opinion of the coder when choosing a numerical score for each attribute, so an element of subjectivity is unavoidable. Accordingly, the results cannot be regarded as absolute values as the score could vary depending on the attitudes of individual practitioners carrying out the coding process.

- 2.2.4 It must also be remembered that the iRAP process is wholly concerned with the theoretical safety risk of roads. It does not and cannot indicate whether a particular route would be suitable, attractive or practical as a route for any particular road-user group.
- 2.2.5 The full results of the applicant's safety Star Rating Scores for each road, in the baseline case, are set out in Tables 3.3 to 3.8 of Annex A. The corresponding results for the future scenario, with development, are shown in Tables 6.1 to 6.6 of the annex. However, a summary of the results is provided below in Table 1.

Table 1 – Summary of Applicant's iRAP Star Rating Scores

Location	Baseline Assessment - Without Development				Future Forecast - With Development			
	Vehicle Occupants	Motor-cyclists	Pedestrians	Cyclists	Vehicle Occupants	Motor-cyclists	Pedestrians	Cyclists
Rickmans lane	1 - 2	1 - 2	1 - 2	1 - 2	2 - 5	2 - 5	2 - 5	2 - 5
Foxbridge lane	1	1	1	1	5	5	4	5
Village Rd / Plaistow Rd Kirdford	1 - 3	1 - 3	1 - 3	1 - 3	1 - 3	1 - 3	1 - 3	1 - 3
Plaistow Road Ifold	1 - 3	1 - 3	1 - 3	1 - 3	1 - 4	1 - 4	1 - 3	1 - 5
B2133 Vicarage Hill Loxwood	1	1	3	1	1	1	3	1
Junct 6 - Vicarage Hill / Plaistow Rd	1 - 2	1	1 - 4	1	1 - 2	1	1 - 4	1
Junct 9 - Guildford Rd / Church St	2 - 4	1 - 3	1 - 4	1 - 3	2 - 4	2 - 4	1 - 4	2 - 3
Junct 12 - Newbridge Rd / Newpound	1 - 3	1 - 3	1 - 3	1 - 3	1	1	1	1

2.2.6 The results indicate the greatest changes in Rickman's Lane and Foxbridge Lane. Other improved scores are claimed for certain sections of Plaistow Road in Kirdford and Ifold (see Tables in Annex A for details). These are directly linked to the off-site highway improvement measures proposed in these locations; which are discussed below.

2.3 Proposed Highway Improvements

- 2.3.1 Section 4 of Annex A contains details of the proposed off-site highway improvement measures associated with the RGV proposals. The principal component of the applicant's highway mitigation strategy is the introduction of mandatory 20mph speed limits throughout much of the core study area, including Rickman's Lane, The Street, Foxbridge Lane, Plaistow Road and Loxwood Road together with traffic calming measures in the form of carriageway markings, rumble strips and gateway features. The 20mph speed limit is to be enforced with a network of average speed cameras.
- 2.3.2 Other proposed improvements include passing laybys throughout Foxbridge Lane, a new section of footway/bridleway along part of Rickman's Lane and a new footway on part of Plaistow Road, Kirdford. Equestrian collision avoidance signage is proposed at the junction of Rickman's Lane and Foxbridge Lane; and improvements to local bridleways are also proposed.

2.3.3 In addition, a number of capacity improvements are proposed at three off-site junctions including Vicarage Road / Plaistow Road, the A281 Guildford Rd / B2128 Church Street junction; and the B2133 / A272 Newbridge Rd junction.

20mph average speed limits

2.3.4 The applicant proposes a network of speed cameras covering Rickman's Lane, The Street and Foxbridge Lane. The 20mph zone would also include the sections of Plaistow Road and Loxwood Road between Foxbridge Lane and The Street to discourage re-routing of traffic to avoid the restrictions. Whilst the aim of encouraging a safer environment for walking and cycling is understood and welcomed, the scope and extent of the restrictions is considered excessive and inappropriate for this rural location; and inadequate to mitigate the adverse impacts of the development.

2.3.5 It is apparent this proposal is focussed on improving the iRAP scores for the area. The detailed calculations for the future scenario (with development) SRS forecasts have not been provided, but it is clear that great weight has been attached to the proposed reduction in speeds. For example, Foxbridge Lane is predicted to go from a 1* rating (the worst) to a 5* rating (the best), even though pedestrians and cyclists will remain unsegregated from vehicular traffic and no other improvement measures are proposed.

2.3.6 The key aim of the applicant's vision for RGV (set out in the Transport Assessment) is to create a settlement that is not car-led and one that actively encourages walkers and cyclists to access facilities within surrounding villages. The 20mph speed limit does not make the routes for pedestrians and cyclists any shorter or more direct, nor does it provide lighting, or segregation from general traffic. Its contribution to making journeys on foot or by bicycle more attractive would be minimal and wholly insufficient to generate the step-change in modal choice necessary to meet the stated vision for the development.

2.3.7 The introduction of a wide-area 20mph zone would adversely affect journey times for the wider public who use these routes for access. The motivation for this initiative is to benefit the development in the hope it would encourage higher levels of active travel. However, there is no evidence this would be achieved and the resulting time penalties imposed on existing road users are therefore unnecessary and cannot be justified.

2.3.8 A further flaw of the proposal is that the introduction, operation and maintenance of speed cameras, is a police matter and not within the control of the developer. Additionally, the introduction of speed limit changes is a matter for West Sussex County Council and also beyond the control of the applicant. Therefore, there is no certainty that the proposed system of speed limits and enforcement cameras could be delivered, or secured in perpetuity – which would be a necessary obligation to guarantee the claimed mitigation benefits for the whole life of the development.

2.3.9 This flaw is recognised in paragraph 4.1.4 of Annex A which notes that if the cameras cannot be delivered an alternative (but unspecified) scheme of traffic calming measures would be proposed. This again fails as such works would be beyond the control of the applicant – they would require public consultation and could not be implemented without the agreement of West Sussex County Council. Additionally, there is no certainty that such a scheme would not result in an unacceptable urbanising of the area or that it would achieve the levels of mitigation needed to offset the adverse impacts of the development.

Passing Places on Foxbridge Lane

2.3.10 The applicant proposes the construction of six passing places on Foxbridge Lane. These are shown on Drg PB9500-RHD-RG-SW-DR-D-004 in Annex A. The proposals shown are indicative designs based on two-dimensional OS mapping rather than a three-dimensional topographical survey. Verge widths are very narrow throughout the northern section of the lane and there are significant level differences at the carriageway edge. The presence of highway ditches and trees along the highway boundaries also needs to be considered. Further design work is needed by the applicant to confirm the practical feasibility of carrying out the construction works and the resulting visual and landscape impacts.

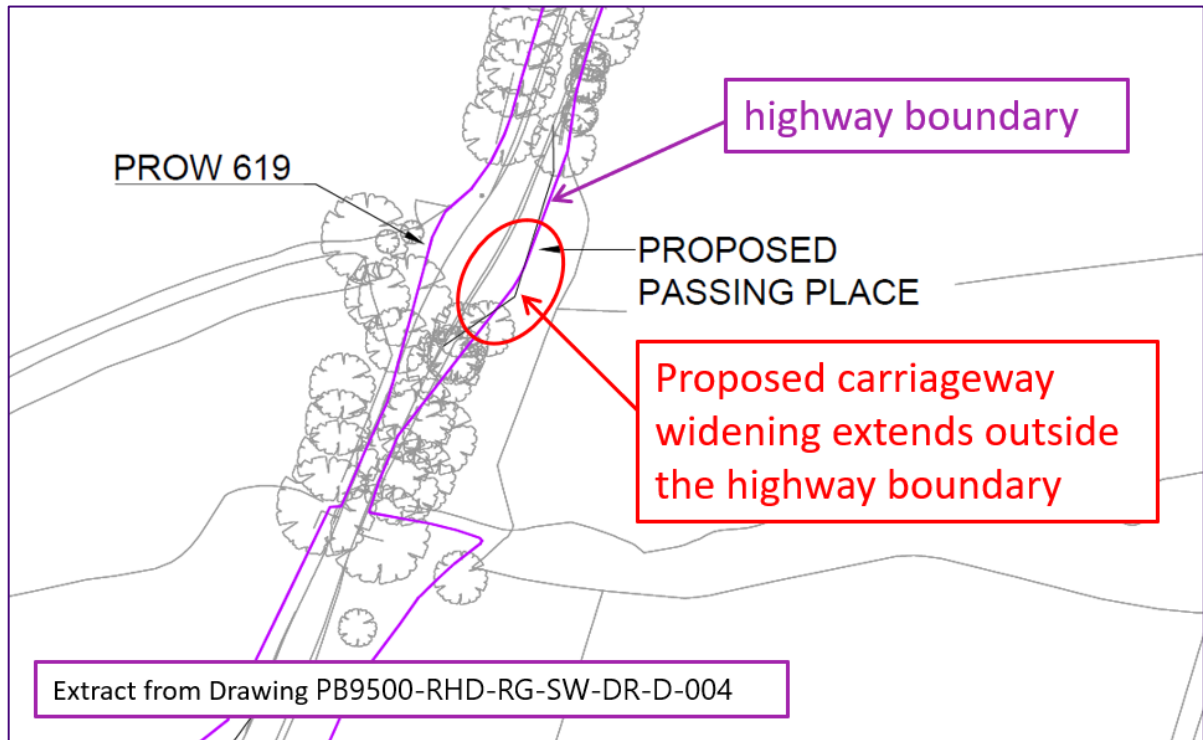
2.3.11 Similar proposals were proposed in relation to the failed Crouchlands Farm Biogas proposals, which were refused following a planning appeal in 2017 (Ref APP/P3800/W/3134445). The Inspector found that such works would not materially improve traffic flow or pedestrian safety but would cause harm to the rural character of the lane. In paragraph 60 of the decision letter the Inspector states *"from what I saw on my site visit and from a study of the proposed widening measures, I conclude that the suggested changes would not result in any significant improvement to the free flow of traffic in Foxbridge Lane or contribute to the safety of pedestrians and riders to any meaningful degree"*.

2.3.12 At paragraph 63 of the decision letter, the Inspector continued *"I am also of the opinion that the improvements would cause a degree of harm to the rural character of this country lane through the loss of roadside trees and the additional areas of hard surfacing and, whilst this would not be severe, it would nonetheless have a detrimental impact that would need to be set against any, albeit minimal, benefits to the free flow of traffic"*.

2.3.13 These same concerns apply in this case. The passing places would offer no material benefit to the flow of traffic, or to pedestrian safety, but would result in harm to the rural character of the lane.

2.3.14 It is also noted that one of the passing places, opposite PROW 619 extends into third party land, beyond the highway boundary, as shown in the diagram below. It is unclear if this is a drafting error or if the applicant has secured control over the land needed for this passing place.

Diagram 1



Rickman's Lane Bridleway and Equestrian Signing

2.3.15 A 220m section of new bridleway is proposed at the eastern end of Rickman's Lane, on the north side of the lane. A 'grassed gravel' surface is proposed. The eastern end would connect to PROW 637 close to the Foxbridge Lane junction but the western end terminates part way along Rickman's Lane, without connecting to any other bridleway or footway or the proposed development. The purpose of this short and disconnected section of bridleway is not explained. In practice it would not materially improve facilities for equestrians. Nor would it offer any material benefit for pedestrian or cyclists.

2.3.16 An actuated warning sign to alert drivers to the presence of horse riders is proposed at the junction between Rickman's Lane and Foxbridge Lane; referred to by the applicant as a 'collision avoidance system'. Such signage would require the approval of the highway authority, which cannot be guaranteed. Even if approved, one isolated sign would offer limited benefits to equestrians and would provide minimal mitigation relative to scale of impacts generated by the development.

PROW Improvements

- 2.3.17 A number of improvements to existing PROW's including works to improve drainage and surface conditions, plus additional wayfinding signage. Even with these works the network of PROW provides limited opportunities for walking and cycling other than for recreational purposes. To achieve the level of modal shift to active travel, necessary to meet the RGV vision for a highly sustainable settlement that is not car-led, high quality routes that are 'coherent', 'direct', 'safe', 'comfortable' and 'attractive' would be needed (as explained in DfT's Local Transport Note 1/20 dealing with cycle infrastructure design).
- 2.3.18 None of the PROW's serving the site, with or without improvements, are capable of meeting the needs of pedestrians and cyclists for journeys to work, education, shopping, healthcare or other services that residents will need to access on a day to day basis.

Off-Site Junction Improvements

- 2.3.19 Improvements are proposed at three off-site junctions as follows.
- 2.3.20 Minor kerb adjustments are proposed at the Vicarage Hill / Plaistow Road junction. This is largely a cosmetic change that will not materially affect the operation of the junction.
- 2.3.21 Similar minor works are proposed at the A281 Guildford Road / B2128 Church Street junction in Rudgewick (approximately 6 miles northeast of the site). Again, these will not materially affect the operation of the junction.
- 2.3.22 The junction between the B2133 and A272 Newbridge Road, near Wisborough Green is proposed to be upgraded from a Simple Priority Junction to a Ghost Island Junction (incorporating a right-turn lane on the A272 arm). However, Section 4.2.3 of Annex A acknowledges there is insufficient highway land to accommodate the design without compromising design standards. A number of departures from standards are needed including visibility distances, deceleration lane length and the tapers for the Ghost Island and verge widths. The applicant also acknowledges a number of buildability constraints including existing walls and utility services.
- 2.3.23 In view of these considerations, it is highly unlikely that the scheme would be acceptable to the highway authority, or deliverable. In any event, such improvements are remote from the site and, in common with the other off-site junction proposals, would have no bearing on the sustainability of the proposed development.

2.4 Active Travel Assessment

2.4.1 Section 5 of Annex A contains an Active Travel Assessment based on the guidance in the DfT's Local Transport Note (LTN) 1/20. The five core design principles from Figure 1.1 of LTN 1/20 are reproduced below.

LTN 1/20 Figure 1.1 – Core Design Principles

Accessibility for all				
Coherent	Direct	Safe	Comfortable	Attractive
 <p>DO Cycle networks should be planned and designed to allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of a consistently high quality.</p>	 <p>DO Cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles.</p>	 <p>DO Not only must cycle infrastructure be safe, it should also be perceived to be safe so that more people feel able to cycle.</p>	 <p>DO Comfortable conditions for cycling require routes with good quality, well-maintained smooth surfaces, adequate width for the volume of users, minimal stopping and starting and avoiding steep gradients.</p>	 <p>DO Cycle infrastructure should help to deliver public spaces that are well designed and finished in attractive materials and be places that people want to spend time using.</p>

2.4.2 Annex A examines the development proposals against these principles using the Cycling Level of Service Tool in Appendix A of LTN 1/20.

2.4.3 In terms of **coherence**, Annex A acknowledges that there is no existing cycle infrastructure in the area and none is proposed, but argues that additional wayfinding signs on bridleways will assist cyclists. It is however clear that the LTN 1/20 objective to *“allow people to reach their day to day destinations easily, along routes that connect, are simple to navigate and are of consistently high standard”* cannot be met in this case.

2.4.4 With regard to **directness**, Annex A acknowledges that cycle routes to and from the sites are indirect and that this will not change. The core objective that cycle routes should be *“at least as direct – and preferably more direct – than those for private motor vehicles”* cannot be met in this case.

2.4.5 With regard to **safety**, the applicant acknowledges that no segregation from motor vehicles exists (or will be provided) but points out that the proposed 20mph speed limit will improve safety for cyclists. As noted above (2.3.8) there is considerable doubt that the 20mph speed limit and enforcement cameras could be installed and maintained in perpetuity. In addition, the lack of segregation is a more significant factor in cyclist safety. Therefore, the claimed safety benefits would be minimal and cannot be guaranteed.

- 2.4.6 In terms of **comfort**, LTN 1/20's Cycling Level of Service Tool states that "*cyclists should be able to comfortably cycle without risk of conflict with other users*". The absence of any segregation between cyclists and vehicles means that this objective cannot be met. The applicants proposed wayfinding signage would have minimal impact on cyclist comfort levels.
- 2.4.7 With regard to **attractiveness**, LTN 1/20 notes that routes should be "*appealing and be perceived as safe and usable*", identifying that '*lighting*' and '*isolation*', are key indicators. It advises that "*well used, well maintained, lit, overlooked routes are more attractive and therefore more likely to be used*". The cycle routes servicing the site do not come close to achieving these objectives and will continue to be unattractive to cyclists.
- 2.4.8 The applicant argues that cycle parking within the proposed development and in the proposed Whole Farm Plan (LPA Ref 22/01735), will contribute towards making cycling more attractive. However, this small contribution fails to address the key factors affecting the lack of attractiveness of the routes serving these proposed developments and the distances cyclists would need to travel to access day to day services.



3 ANNEX B – Junction Modelling Report

3.1 Context

3.1.1 Annex B restates the 'Vision' for RGV, as originally set out in the November 2022 TA. It also restates the proposed "Decide and Provide" trip generation methodology as originally contained in Appendix A of the November 2022 TA. The annex then sets out calculations of trip generation and traffic distribution and includes junction capacity modelling for various off-site junctions on routes serving the development.

3.2 Vision

3.2.1 Annex B restates the vision to *"create a rural settlement which is not car-led, to actively accommodate the different types of walkers, cyclists, public transport users and equestrians in and around the site"*. Based on this concept the applicant argues that a "Decide and Provide" approach to trip forecasting is appropriate, instead of using a conventional "Predict and Provide" methodology based on observed data (such as the TRICS database).

3.2.2 As noted in our original Phase 1 Objections Report (June 2023), the "Decide and Provide" methodology being advocated by the applicant derives from a research paper and guidance note by the TRICS organisation (Guidance Note on the practical implementation of the decide and provide approach – TRICS – February 2021). This document has no formal status; it does not form part of any local or national policy relating to planning, nor has it been endorsed by any official national or local government decision making body.

3.2.3 Such an approach may have relevance where it is clearly demonstrable that a step-change in travel behaviour could be delivered, through the provision of high quality new access links for public transport and active travel and where there is a full and attractive range of day to day services and facilities withing easy walking and cycling distance. These circumstances do not apply to RGV and therefore the use of an untried and untested philosophy cannot be justified.

3.3 Trip Generation and Distribution

3.3.1 During previous consultations with, and on the recommendations of, WSCC the applicant agreed to use the same vehicle trip rates that were agreed for a recent development site in Kirdford (Ref 19/00086/FUL). Annex B provides forecasts based on these trip rates but also provides alternative "Decide and Provide" trip rates, which the applicant has adjusted to account for potential reductions in car use and increases in public transport and active travel modes.

3.3.2 The applicant's currently proposed Decide and Provide rates are less ambitious than the versions included in Appendix A of the original November 2022 TA but still represent a departure (reduction) from the Kirdford, Predict and Provide, trip rates recommended by WSCC. A comparison of the trip rates is presented in Table 2 below.

Table 2 – Comparison of 2-Way Peak Hour and Daily Trip Rates

Time Period	Predict & Provide	Decide & Provide	Difference	% Change
AM Peak	0.501	0.462	-0.04	-7.8%
PM Peak	0.569	0.524	-0.04	-7.9%
Daily	4.273	4.182	-0.09	-2.1%

3.3.3 This shows that peak hour trip rates are approximately 8% lower than the previously agreed rates. The use of these reduced trip rates throughout all sections of the traffic impact and environmental impact assessments means that the full, potential impacts of the development have not been accounted for.

3.3.4 The trip distribution analysis shows that the majority of traffic travelling to and from the site will be attracted to/from the east and south of the site, with a much smaller proportion to the west and north. This is evidenced from the traffic flow diagrams in Appendix F and in Table 3.9 of Annex B which show 72% of traffic arriving and departing to the east on Rickman's Lane, with 28% from the west. Of the 72% eastbound traffic, 58% travels via Foxbridge Lane for access to the B2133 at Vicarage Hill with the remaining 14% travelling via Kirdford.

3.3.5 It is noted that the trip distribution percentages for Phase 2 are slightly different from those shown in the Phase 1 documents, which indicate a 70/30 directional split on Rickman's Lane, with 60% using Foxbridge Lane. The reason for this difference is unexplained.

3.3.6 Whichever version is used the assessment shows a high reliance of Foxbridge Lane for access to the development. This reliance on Foxbridge Lane as the key traffic route for the majority of site generated trips underlines the inherent locational disadvantage of the site. Foxbridge Lane is constrained narrow country lane and entirely unsuitable as the main traffic route for the development.

3.3.7 The limitations of the lane are well understood by WSCC. During roadworks, when temporary traffic diversions are set up (due to road closures for emergency road or utility works), Foxbridge Lane is deliberately excluded as a diversion route due to its poor highway standards and inability to accommodate increased traffic volumes.

3.4 Junction Capacity Assessment

- 3.4.1 Annex B contains junction capacity modelling for 11 off-site junctions on routes serving the site. The assessment shows that several junctions within the study area will be experiencing congestion in the 2037 future year scenario, due to a combination of background traffic growth, committed development, the Phase 1, Phase 2 and Whole Farm Plan proposals.
- 3.4.2 Considering the Phase 2 development in isolation, this phase represents the largest component in terms of overall traffic generation for the combined development proposals (Phase 1, Phase 2 and the WFP) – amounting to 70% of overall trips. This confirms that Phase 2 is the largest contributor towards the cumulative impacts of the development.

4 ANNEX C – BUS SERVICE TECHNICAL NOTE

4.1 Context

- 4.1.1 The current, September 2023, Annex C is an updated version of the earlier January 2023 document.
- 4.1.2 The substance of the document is largely unchanged and the bus service proposals are identical. Therefore, the comments made in relation to Annex C in our original Objections Report dated June 2023 remain valid. The key points are summarised below.

4.2 Proposed Bus Service

- 4.2.1 The applicant's proposal for a half-hourly shuttle bus between the site and Billingshurst remains. Two routes are suggested, one via Plaistow and Ifold and the other via Kirdford. The proposal to alternate between the two routes would mean that the frequency for passengers accessing each of the villages would be reduced to an hourly service.
- 4.2.2 The proposal to provide free travel for all occupants of RVG and Crouchlands Whole Farm Plan also remains and accordingly the service could never generate sufficient fare revenues to become financially viable and would be reliant on ongoing subsidies.
- 4.2.3 The fundamental problems associated with the bus service proposals have not been addressed. The principal concerns are as follows.

- 4.2.4 Firstly, the only destination served is Billingshurst (and villages en-route). Other key destinations for future residents would include Horsham, Crawley, Haslemere, Godalming, Chichester, Petworth, Pulborough and Storrington. The service would therefore only cater for a limited proportion of the travel demands for residents. Onward travel to these other locations would require onward connections and extended journey times making them less attractive than car travel.
- 4.2.5 The proposed 15-minute community, advocated by the applicant, includes Loxwood, which would not be served by the bus. The other villages of Plaistow, Ifold and Kirdford would only be accessible with an hourly bus service.
- 4.2.6 Secondly, the estimates of passenger numbers in the original document have been omitted from the revised version, but these highlight the low levels of demand for the bus service, previously estimated at between 3% and 4% of overall travel. This very low take up of bus usage falls a long way short of the step-change in travel behaviour needed to meet the applicant's vision for a highly sustainable new village.
- 4.2.7 Finally, the estimated annual operating cost of £400,000 is unchanged and highlights the significant subsidy funding that would be needed. As there would be no fare income from the development, and very minimal revenue from fare paying passengers en-route, the service could never become self-supporting. The developer proposes a £4M contribution to fund the service for 10 years. In practice this would mean that the service would cease after the subsidy period and any sustainable travel benefits arising from it would also cease; undermining the stated vision for a highly sustainable settlement.

5 ENVIRONMENTAL STATEMENT ADDENDUM

5.1 Context

- 5.1.1 The original Environmental Statement (ES) was incomplete as the Transport and Access chapter was missing. The new Environmental Statement Addendum (ESA) now includes a new Traffic and Movement chapter.

5.2 Traffic and Movement Chapter

- 5.2.1 The ESA considers the standard range of transport related environmental topics including Severance; Driver and Pedestrian Delay; Non-Motorised User Amenity; Fear and Intimidation and Highway safety. As is normal practice, the author of the report sets their own assessment thresholds and significance criteria. Whilst this establishes consistency within the document, it means that only one version of analysis is made – different practitioners applying different thresholds for assessment and significance attributes would generate different results.

- 5.2.2 The assessment methodology, in terms of highway safety matters, aligns closely with the concepts set out in the Annex A Road Safety Report (discussed in Section 2 above); and relies heavily on the claimed mitigation benefits of the speed limit reduction proposals.
- 5.2.3 A key area of concern for the Parish Council is the adverse impact of vehicular traffic on the routes likely to experience the greatest net change in traffic conditions (in terms of overall vehicle flows and HGV numbers). The following comments therefore primarily relate to Rickman's Lane and Foxbridge Lane. However, this does not mean that the Parish Council considers the impacts elsewhere on the network to be acceptable.
- 5.2.4 A key area of concern is that the two routes which experience the greatest change in traffic conditions – Rickman's Lane and Foxbridge Lane – are assumed by the applicant to be 'Low Sensitivity'; in terms of both construction phase and operational phase impacts. Given the quite rural nature of these lanes, the presence of residential properties fronting the highway, the presence of the scout hut and the lack of facilities for non-motorised road users, we consider these routes to be of 'High Sensitivity'.
- 5.2.5 Table 3-16 of the ESA shows a 227% increase in traffic flows on Rickman's Lane associated with Phase 2, with a 273% increase with Phase 1 added. The corresponding forecasts for Foxbridge Lane are a 168% increase for Phase 2 and 202% increase for Phases 1 and 2 combined. These forecasts confirm that the proposed development would result in major impacts on these quiet rural lanes.
- 5.2.6 The assessment predicts that neither Phase 1 nor Phase 2 will generate any HGV traffic. This is clearly unrealistic as all residential areas attract daily deliveries from light, medium and heavy good vehicles. Any goods vehicles over 3.5T or with twin rear axels are classified as HGV's and a high proportion of courier and delivery vehicle fall into this category. Bulky goods (white goods, furniture, building materials etc) are generally transported using HGV's. Many service vehicles and most removals vehicles would also be classified as HGV's. The assumption of zero HGV's is therefore unrealistic and grossly underestimates the impacts of the development.
- 5.2.7 As a consequence of this misrepresentation of route sensitivity and HGV changes, the resulting assessment of the significance of the impacts is flawed. For example, the impacts of construction traffic, in respect of all environmental factors (Severance, Delay, Non-Motorised User Amenity, Fear and Intimidation), are assessed as 'negligible' on both routes. This is clearly an unrealistic and overly optimistic forecast.
- 5.2.8 Similar comments apply in respect of the operational phase assessment, where 'negligible' impacts are predicted for both Rickman's Lane and Foxbridge Lane, following the introduction of the proposed 20mph speed limit.

5.2.9 In view of the errors identified above, the results of the Environmental Impact Assessment are unrealistic and unreliable and should be afforded little weight.

6 TRAVEL PLANS

6.1 Context

6.1.1 The original Transport Assessment (TA) dated 23 November 2022 refers to the provision of an Interim Residential Travel Plan (RTP). However, the TA has not been updated and no such RTP has been provided. The absence of a RTP means that no assessment can be made of the applicants proposed strategy for ensuring sustainable travel choices, nor is there any information on proposed mode share targets or how these would be delivered.

6.1.2 The Interim Travel Plan for the proposed primary school (dated 23 November 2022) has not been updated. Our comments in respect of that document remain as set out in our original Objection Report dated June 2023.

7 CONCLUSIONS

7.1 The information that was missing when the planning application was originally submitted has now been provided. The new data provides more detail and has enabled a fuller assessment of the development impacts to be undertaken.

7.2 The applicant's vision relies on the creation of a highly sustainable and mostly self-sufficient new village, underpinned by the concept of a '15-minute community' with high quality public transport, walking and cycling connections to everyday services and facilities. However, the new data confirms that the proposed measures for active travel and public transport fall well short of the standard necessary to achieve the stated vision and transport strategy for the development.

7.3 The vision relies on linkages to the surrounding villages of Plaistow, Ifold, Kirdford and Loxwood, together with those in the proposed Crouchlands 'Whole Farm Scheme' (subject to a separate planning application) to contribute towards meeting the day to day needs of future residents. However, given the limited range of services these locations would provide, it is clear that the full range of employment, education, shopping, healthcare and leisure needs could not be met.

- 7.4 The vision also relies on high quality and convenient access to these locations on foot, by bicycle and bus. The necessary high quality walking and cycling links do not currently exist and there are no proposals to provide them. The proposed 20mph speed limit will not make the routes for pedestrian and cyclists any shorter or more direct, nor does it provide lighting, or segregation from general traffic. Its contribution to making journeys on foot or by bicycle more attractive would be minimal and wholly insufficient to generate the step-change in modal choice necessary to meet the stated vision for the development. In addition, there is no certainty that the proposed speed limits and enforcement cameras could be delivered, or secured in perpetuity – which would be a necessary requirement to ensure that the claimed mitigation benefits would remain for the whole life of the development.
- 7.5 The existing public rights of way are indirect, unsurfaced, unlit and remote from local facilities. There is no evidence that these could be improved sufficiently to make walking and cycling the preferred first choice for residents.
- 7.6 The proposed bus service does not serve all of the locations within the proposed '15-minute Community' catchment area, it is not of sufficient frequency and does not serve sufficient destinations to make bus use more attractive than the car. The developer funding would run out after ten years with no realistic prospect that the service would continue and hence the claimed benefits of the service would be lost.
- 7.7 The applicant has failed to demonstrate that the transport strategy can be delivered or that the necessary step-change in travel behaviour outlined in the vision for the development, can be achieved. The proposal would therefore result in an isolated, car-dependant, housing estate remote from local services, with inadequate public transport provision. The proposal is therefore contrary to national and local transport sustainability policy objectives and should be refused.