

Rickman's Green Village - Phase 2

Planning Application Ref: 22/03131/OUTEIA (492 dwellings)

Objection on Highway and Transport Grounds

Plaistow and Ifold Parish Council

June 2023



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 Phase 2 planning application for the development of up to 492 dwellings and a 2-Form Entry Primary School (Ref 22/03131/OUTEIA).

1.2 The planning application is supported by the following transport related documents, prepared by consultants Royal Haskoning DHV:

Transport Assessment (TA), dated 23 November 2022

Environmental Statement (ES), dated 29 November 2022

Primary School - Interim Travel Plan (ITP), dated 23 November

Transport Assessment Annex C – Bus Service Technical Note, dated 19 January 2023

1.3 It is noted at the outset that this planning application is currently incomplete as key transport information is missing from the applicant's submission. In particular, Annexes A and B dealing with road safety analysis; off-site highway and transport improvements; traffic generation, distribution and assignment; traffic modelling and impact assessment have not yet been submitted. Both of these annexes are cross-referenced in the TA, stating that they will be submitted separately. Also missing is the 'Transport and Access' chapter of the Environmental Statement. Due to the absence of these documents, the transport impacts of the development have not been quantified and cannot be assessed.

2 TRANSPORT SUSTAINABILITY

2.1 The Vision for Rickman's Green Village

- 2.1.1 Section 2 of the TA sets out the developers' vision to create a new sustainable village of up to 600 dwellings, linked to the Crouchlands Farm 'Whole Farm Plan' (a mixed-use employment, retail and leisure proposal under planning application 22/01735/FULEIA) and a separate Phase 1 detailed planning application (Ref 22/03114/FULEIA) for 108 dwellings.
- 2.1.2 The applicant's stated aspiration is to create a new settlement that is "not car-led" by seeking to promote high levels of walking, cycling and public transport and through adopting the principles of a '15-minute Community'. This is an adaptation of the '15-minute City' and '15-minute Neighbourhood' urban planning principles that are emerging in other countries and being trialled in some UK cities. The objective being to ensure that key daily needs including employment, shopping, education, healthcare and leisure can be met within a 15-minute walk or bike ride. In this case, however, the applicant is seeking to apply the concept to a rural, village location and proposes to include public transport to expand the 15-minute travel catchment area and thereby increase the range of services and facilities available.
- 2.1.3 The proposed 15-minute community includes Plaistow, Ifold, Kirdford and Loxwood. None of these villages are within a 15-minute walk and only Plaistow, Ifold and Kirdford can be reached within a 15-minute cycle ride. The proposed bus service (discussed further in Section 2.2 below) would not be able to reach all four villages without severely compromising journey times and frequencies.
- 2.1.4 Currently there is no conclusive evidence to confirm the extent to which 15-minute City's reduce external trip making, or that the principles can be transferred to a rural environment. In order for the majority of residents daily needs to be met within a 15-minute catchment, there would need to be an exceptional number and range of services and facilities available together with outstanding connectivity by sustainable travel modes; i.e. facilities and transport provision comparable with major cities. These criteria cannot be achieved for a development of the scale and range proposed at Rickman's Green Village.
- 2.1.5 The applicant argues that the combined Rickman's Green Village and Whole Farm Plan schemes will support the 15-minute community concept but the evidence for this has yet to be provided. It is also clear that the current planning application is dependant upon the non-residential land uses associated with the Whole Farm Plan planning application, which may or may not be approved. Therefore, there is no guarantee that the levels of sustainability necessary to render the current planning application acceptable, can be achieved.

2.2 Transport Strategy

- 2.2.1 Within the development the applicant seeks to prioritise pedestrian and cycle movement through the use of 20mph streets and by discouraging car use by limiting on-street parking using narrow street designs. The TA also states that most residential parking will be located off-plot, away from individual dwellings, so that residents' cars are not directly accessible near their front doors. There are no details as to how this would be managed or controlled, or how residents would deal with loading/unloading goods or passengers at their properties.
- 2.2.2 A review of the proposed site layout for the Phase 1 planning application (HLM Architects Drg RGV-HLM-00-ZZ-DR-A-00602/P01) seems to indicate a departure from the above concept and shows car parking easily accessible to individual properties, both on-street and in parking courts. This is discussed further in our separate representations on Planning Application 22/03114/FULEIA.
- 2.2.3 Outside the limits of the development, the developer proposes that existing footpaths and bridleways will be used to promote walking and cycling trips to facilities in surrounding villages. The TA also states that substantial improvements to public transport will be delivered. These key aspects of the transport strategy are discussed in more detail below.

Walking and Cycling and Horse Riding

- 2.2.4 Section 6.3 of the TA acknowledges that there are gaps in connectivity for pedestrians, cyclists and equestrians and states that a package of new and improved off-site pedestrian, cycle and equestrian infrastructure will be provided. The details of these improvements are to be submitted separately, in Annexes A and B of the TA, but are not currently available. The TA explains these will include enhanced Public Rights of Way (PROW) and works to Rickman's Lane and Foxbridge Lane to reduce traffic speeds.
- 2.2.5 The absence of this critical information means it is not possible to determine whether the walking /cycling strategy is viable or capable of delivering the desired levels of mode share needed to achieve the developments' sustainability objectives.
- 2.2.6 The existing PROW network provides a patchwork of footpaths, bridleways and byways linked to existing public highways that combine to provide a mixture of on and off-road recreational walking, cycling and riding routes. The off-road sections are unsurfaced and unlit. The on-road sections are predominately unlit and involve shared-use with vehicular traffic. There are no continuous or direct off-road routes for pedestrians and cyclists between the site and surrounding facilities including education, employment or shopping.
- 2.2.7 The distances to surrounding facilities together with the indirect nature of the routes, lack of lighting, seasonal variations in surface conditions and the need to use roads without footpaths, will limit their appeal to many residents, particularly those with mobility difficulties and those with concerns about personal security.

2.2.8 It highly unlikely the current public rights of way could be improved sufficiently to make walking and cycling the preferred first choice for residents of the development.

Public Transport

2.2.9 The developer proposes to introduce a new bus service between the site and Billingshurst. This is proposed to be a half-hourly service on Mondays to Saturdays with an hourly service on Sundays. The service would provide access to Billingshurst and would facilitate onwards connections via the rail station and the existing 100 bus service between Billingshurst and Horsham. The TA states that the bus would be free to use for residents of the development.

2.2.10 Annex C of the TA contains a technical note exploring the feasibility of the bus service and possible routing options. It identifies key destinations for Rickman's Green Village residents as Cranleigh, Billingshurst and Horsham although no evidence to support this is provided. No details are provided regarding the demand for journeys to other nearby population centres such as Haslemere, Godalming, Petworth, Pulborough or Storrington.

2.2.11 Section 2.1 of TA Annex C acknowledges that "*The site's rural location, away from significant centres of population and activity, gives several challenges for providing public transport*". It further acknowledges "*There is a need for public transport to be able to meet many needs, to avoid people defaulting to car use. However, this is equally difficult to gauge without knowing about the actual people who will be attracted to live at Rickman's Green Village and their precise needs*".

2.2.12 Recognising that it would be impractical to provide services to multiple destinations, the technical note focusses on the provision of a "*shuttle service between Rickman's Green Village and Billingshurst*". Three potential route options are discussed in the technical note as follows; via Plaistow and Ifold, or via Kirdford, or direct to Billingshurst via Foxbridge Lane (avoiding Plaistow, Ifold and Kirdford). None of the options include Loxwood.

2.2.13 To achieve the proposed half-hour service frequency, it would not be possible to serve all four of the rural communities (Plaistow, Ifold, Kirdford and Loxwood) named within the applicant's proposed 15-minute community. Alternating between various routes would mean that the frequency of services to some of the villages would have to be reduced to either an hourly or 90-minute frequency.

2.2.14 The technical note focusses on a half-hourly service via Plaistow and Ifold and based on this the applicant's provisional, but unsubstantiated, estimates envisage a bus mode share of between 3% and 4%. 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.

- 2.2.15 It is clear that the proposals for bus services are at an early stage and largely aspirational at present. The cost of running the service is estimated by the applicant to be circa £400k per year (the cost of running 2 diesel powered buses including drivers' salaries and vehicle operating costs). Any income from fare revenues would be used to off-set these costs but the proposal to offer free travel to residents means that the potential income stream from fare paying passengers would be severely limited.
- 2.2.16 The patronage forecasts set out in the technical note are based on a 600 dwelling development rather than the 492 dwelling in this Phase 2 application. Even so, the applicant's calculations suggest that during the early years of the development 20-30 passengers per day might be generated, representing less than 1 passenger per bus journey. Potential patronage for the completed development (600 dw) is estimated at 227 passengers per day, equating to an average of 6 passengers per bus journey. Naturally the equivalent forecasts for a 492 dwelling development would be lower.
- 2.2.17 It is therefore clear, that given the scale of development and the proposal to offer free travel, there is no prospect of the bus service becoming financially viable (a point acknowledged in Section 3.8 of Annex C). This means it would need ongoing funding from the developer. No details of how this would be achieved have been provided. It seems highly unlikely the high levels of subsidy needed to run the service could be sustained in perpetuity, indicating that the service would fail once funding is removed; undermining the sustainability credentials of the transport strategy and the vision for the development.

3 PARKING

3.1 Car Parking

- 3.1.1 As noted in paragraph 2.2.1, the parking strategy proposes off-plot car parking remote from dwellings to help discourage car use. There is no clear strategy for managing or controlling this nor is there any evidence to indicate the extent to which it would reduce car-based journeys.
- 3.1.2 Residents will need to access their properties for the loading and unloading of goods and passengers and those with mobility limitations will need direct access. Visitors and delivery vehicles will also need somewhere to park in close proximity to dwellings. Many people will wish to have sight of their vehicles for surveillance and security and would be likely to park outside their house in preference to a more remote parking court. This behaviour can be seen in many housing developments built over the last 20 years where attempts to limit or restrict parking near properties have failed.
- 3.1.3 The TA mentions the possibility of discounting WSCC car parking standards by 10% to help promote sustainable travel choices but does not say if this will be applied to the development.

3.1.4 In conclusion, there is no evidence that the proposed car parking arrangements will be materially different from a conventional housing estate or that they will have any impact in terms of discouraging car use or reducing car travel to and from the development.

3.2 Cycle Parking

3.2.1 The TA references WSCC minimum cycle parking standards but does not say what levels of cycle parking will be provided. This information should be provided.

4 INTERIM TRAVEL PLAN

4.1 Primary School Interim Travel Plan

4.1.1 The submitted Interim Travel Plan relates only to the proposed 2-Form Entry Primary School. It focuses mainly on travel to the school from outside the development and refers to the proposed half-hourly, free, bus service (to and from Billingshurst) serving the main development and the aspiration that pupils and parents will consider cycling to school from Plaistow, Ifold and Kirdford. It proposes that pupils and staff will be encouraged to adopt sustainable travel choices and make use of the PROW network for journeys to school.

4.1.2 For the reasons set out in paragraphs 2.2.6 and 2.2.7, it seems highly unlikely that walking and cycling would be attractive to parents travelling with young children, other than those originating within the development.

4.1.3 No travel plan has been submitted for the residential element of the proposed development. This should be provided.

5 TRANSPORT IMPACTS

5.1 Trip Generation Traffic Impacts and Mitigation

5.1.1 Section 6.2 of the TA proposes a new approach to the derivation of vehicle trip generation based on the concept of 'Decide and Provide' but no details have been provided. Full details of this new methodology and analysis of the resulting traffic impacts are to be provided later as an Annex to the TA.

5.1.2 Pending the arrival of this information no assessment can be carried out of the traffic or highway safety impacts of the development, the mitigation measures needed, or the impacts of those mitigation measures.

- 5.1.3 It is noted that the Decide and Provide methodology being adopted 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.

6 ENVIRONMENTAL STATEMENT

6.1 Transport and Access Chapter

- 6.1.1 The planning application is supported by an Environmental Statement (ES). However, it is incomplete as the Transport and Access chapter is missing. Chapter 8 of the document simply notes that necessary reports dealing with traffic generation and traffic impact analysis were not available when the ES was drafted. It states that an addendum to the ES will be provided in due course once the missing information becomes available.
- 6.1.2 In the absence of this information, no assessment of the transport related environmental impacts of the development can be made.

7 CONCLUSIONS

- 7.1 Given the extent of missing supporting transport information it is not possible to fully evaluate the impacts of the development. From the documents that are available, there are significant concerns relating to the proposed transport strategy and its ability to deliver the stated vision for the site.
- 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 infrastructure. However, key supporting information is missing and that which is available is insufficient to demonstrate that the vision and transport strategy for the development is achievable.
- 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 cater for the majority of residents day to day needs. Given the limited range of services these locations would provide, it is highly unlikely that the full range of employment, education, shopping, healthcare and leisure needs could be met.

- 7.4 The vision also relies on high quality and convenient access to these locations on foot, by bicycle and bus. These high quality links do not currently exist. It is highly unlikely the current public rights of way could be improved sufficiently to make walking and cycling the preferred first choice for residents. In addition, the proposed bus service does not serve all of these 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.
- 7.5 The applicant's own analysis of the proposed bus service demonstrates that it would not be commercially viable, based on estimated running costs and fare revenues. This shows that the service would fail without continuous, ongoing financial support. Insufficient detail has been provided to explain how the service would be funded and maintained in perpetuity.
- 7.6 The applicant has failed to provide sufficient evidence to confirm that the transport strategy can be delivered or that the step-change in travel behaviour outlined in the vision for the development, can be achieved. Linked to this, no analysis has been provided of the impacts of the development on local transport networks or the environmental impacts on local communities, either with or without mitigation measures. However, from the information currently available, the proposed development has the potential to significantly increase traffic volumes locally to the detriment of existing road users (all modes) and create harm to the amenities of local residents and potentially result in urbanising highway improvements with adverse impacts for the local environment.
- 7.7 It is unlikely that this Phase 2 planning application, in isolation or in combination with the separate Phase 1 planning application, could reasonably deliver the scale or scope of infrastructure improvements necessary to achieve the vision described in the TA. The proposal would therefore result in an isolated, car-dependant, housing estate remote from local services and public transport, contrary to national and local transport sustainability policy objectives.