



# Crawley Local Plan

<p><b>Ref No:</b></p>  <p><i>Office use only</i></p>
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## Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to [strategic.planning@ Crawley.gov.uk](mailto:strategic.planning@ Crawley.gov.uk) or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

### PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client’s name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at [www.crawley.gov.uk/privacy](http://www.crawley.gov.uk/privacy). Specific reference to the Local Plan and planning policy related public consultation can be found [here](#).

### PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple “PART B” sections with a single “PART A” completed.

## PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

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## PART B – Your representation

### 3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

### 4. Which part of the Local Plan does this representation relate to?

Paragraph:		Policy:	EC4	Other:	Allocation of Gatwick Green
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### 5. Do you consider the Local Plan to be: (Please tick)

- |   |     |                                     |    |                                     |
|---|-----|-------------------------------------|----|-------------------------------------|
| 5.1. Legally compliant?                     | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |
| 5.2. Sound?                                 | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |

### 6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

The Gatwick Green draft allocation is considered to have limited ability to facilitate journeys by active travel or public transport, is expected to have a severe impact on the operation of the highway network and the potential to result in major environmental impacts on Balcombe Road.

The impact of the Gatwick Green allocation is significantly underestimated within the Crawley Local Plan Review modelling work.

Paragraph 35 of the NPPF sets out the tests of soundness for which all Local Plans are assessed against. The assessment undertaken within this note has demonstrated that on the basis of highways and traffic analysis that the proposed Gatwick Green allocation is unsound and should not be taken forward.

In particular, it is of the view that the proposed allocation fails the test of effectiveness in that the effects of proposed allocation have not been fully considered and would have a wider effect than set out in the evidence base.

In addition, we consider that the proposed allocation is not consistent with national policy as it would not enable the delivery of sustainable development.

It is on this basis that it is requested that the proposed allocation of Gatwick Green should be removed from the Crawley Local Plan Review (Regulation 19) Submission Publication document.

*If required, please continue your response on an additional piece of paper and securely attach it to this response*

- 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.**

The proposed allocation of Gatwick Green should be removed from the Crawley Local Plan Review (Regulation 19) Submission Publication document.

*If required, please continue your response on an additional piece of paper and securely attach it to this response*

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

- 8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)**

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

- 9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:**

To explain why the Gatwick Green allocation should be removed from the Local Plan.

*The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.*

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: [www.crawley.gov.uk/localplanreview](http://www.crawley.gov.uk/localplanreview)

**Signature**

**Date**

Mr. Asher Ross of JLL

08/07/2021

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# Horley Business Park Development LLP

Representations on the Draft Crawley Local Plan Review  
(Regulation 19) Submission Publication Document

Strategic Policy EC4 – Gatwick Green

June 2021

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Local Plan Representations

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## Report control

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## Document checking

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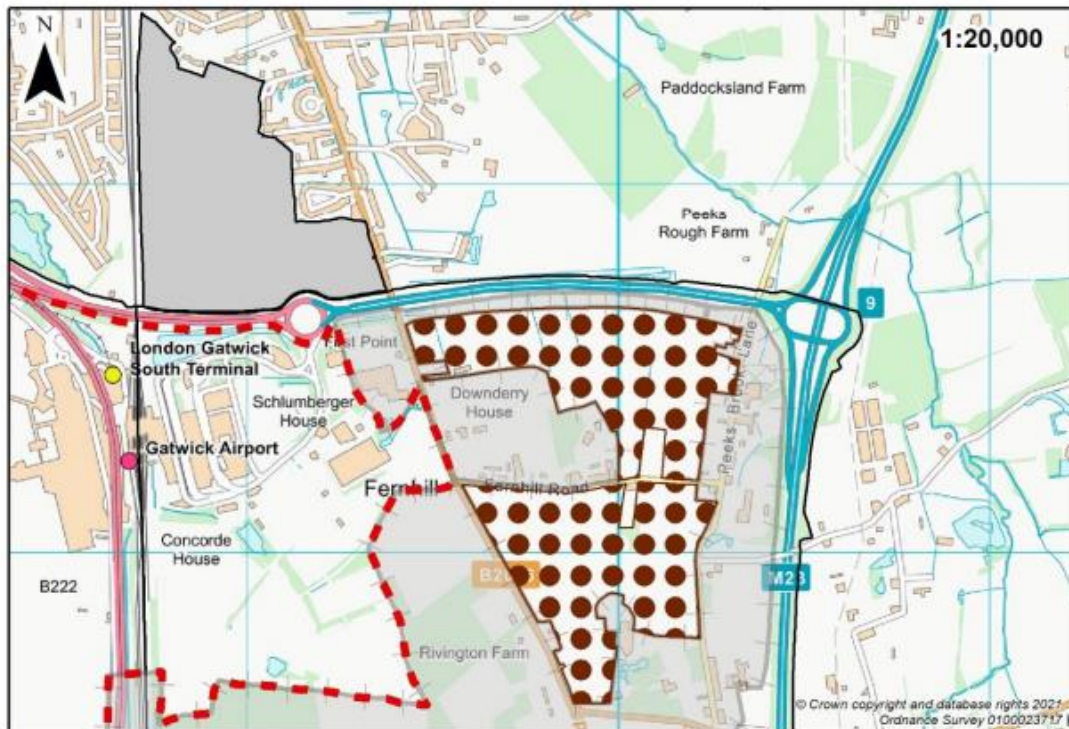
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# 1 Introduction

- 1.1 These representations to the Crawley Local Plan Review (Regulation 19) Submission Publication document and supporting evidence are made by Vectos on behalf of Horley Business Park (Development) LLP in respect of the draft allocation under Strategic Policy EC4 for an industrial led strategic employment site referred to as Gatwick Green.
- 1.2 The site comprises of a parcel of land to the east of Balcombe Road and south of the M23 spur for the comprehensive development of a minimum 24.1ha predominantly for B8 storage and distribution use located as shown in **Figure 1.1** as the parcel of land with dots.



**Figure 1.1: Gatwick Green Location Plan**

- 1.3 The Wilky Group propose to bring forward a mixed use development at Gatwick Green. The i-Transport Transport Strategy document submitted by the Wilky Group anticipates that the development could comprise of the following:

- circa 160,000m<sup>2</sup> GEA of B8 (Warehousing, distribution and logistics);
- circa 52,500m<sup>2</sup> GEA of B1 (Office / employment use); and
- circa 52,500m<sup>2</sup> GEA of C1 (Hotel use).

- 1.4 The above floorspaces are considerably higher than those assumed by Crawley Borough Council for Gatwick Green within the modelling for the Crawley Local Plan Review, which accounts for 77,500m<sup>2</sup> of B8/B2 floorspace (54,250m<sup>2</sup> B8 and 23,250m<sup>2</sup> B2). This suggests that the modelling undertaken for the Local Plan Review considerably underestimates the level of trips that will be generated by the Gatwick Green site.
- 1.5 The focus of these representations is to review the allocation in respect of the accessibility of the site by non-car modes and the cumulative impact on the local highway network when considered alongside the 31ha Horley Business Park allocated in the adopted Reigate and Banstead Local Plan Development Management Plan (Policy HOR9) for predominantly office development (up to 210,000m<sup>2</sup> of B1 and ancillary floorspace) located as shown in **Figure 1.1** as the parcel of land outlined in black and shaded grey.
- 1.6 The modelling work undertaken by Crawley Borough Council as part of the Crawley Local Plan Review assumes a provision of 210,000m<sup>2</sup> of B1/A1/A3/D1 and D2 floorspace for Horley Business Park. This is in line with what is proposed on the site, and is likely to have produced an overestimation of trips for the purpose of modelling when compared to the proposals.
- 1.7 For reference, the following scenarios are assessed within the Crawley Local Plan Review modelling. It is possible to assess the individual impact of Gatwick Green by comparing the results of Scenario 1 with Scenario 2.
- Reference Case – Baseline traffic to 2015, completions between 2015-2020, unbuilt consented development on allocated and other sites, strategic consented development in neighbouring areas, and allocation sites in neighbouring planning authorities, such as Horley Business Park.
  - Scenario 1 – Reference case plus 6,720 dwellings within Crawley Borough, at 420 dwellings per annum and Employment Land Trajectory sites.
  - Scenario 2 – Scenario 1 plus Gatwick Green Employment Allocation.
  - Scenario 3 – Scenario 2 plus West of Ifield (3,750 dwellings) and West of Kilnwood Vale (1,546 dwellings) and 50,000m<sup>2</sup> of employment leading to 12,016 dwellings at 751 dwellings per annum.



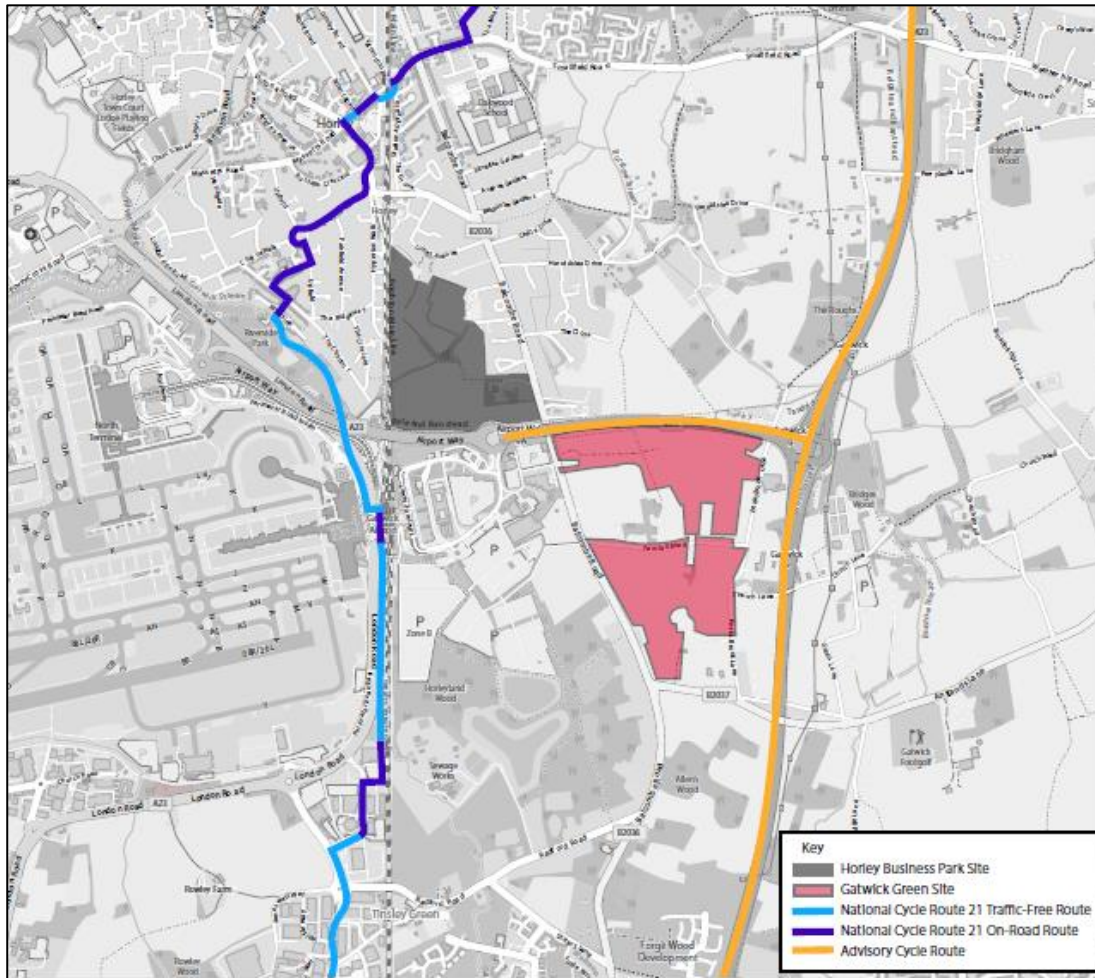
## 2 Gatwick Green

2.1 Paragraph 9.59 of the Draft Crawley Brough Local Plan Submission Publication document states:

*“The Strategic Employment Location is surrounded by strategic transport links, but it has **no immediate access to the strategic road network or Gatwick Airport railway station**. A Strategic Employment Location of the scale proposed at **Gatwick Green will generate surface access demands that will impact upon the existing highways network**. The focus will be to **maximise opportunities to access the site by sustainable transport modes**, particularly for employees. However, given the scale and industrial nature of the proposed development, **development must cater for its operational requirements, particularly HGV movements**, demonstrating through the Transport Assessment and Mobility Strategy how this will be achieved without an adverse impact upon the highways network and residential amenity.....”*

### **Non-Car Accessibility**

- 2.2 It is recognised that the development does not provide direct access to Gatwick Airport railway station. The only available route is via Buckingham Gate and Ring Road South which are predominantly designed for vehicle access to the airport and its car parks; the route does not have continuous pedestrian infrastructure and provides only intermittent footways with poor road crossing facilities. Without direct access to Gatwick rail station and the related bus services the sustainability and accessibility of the site by non-car modes is compromised.
- 2.3 There are are limited public transport services along Balcombe Road . The existing cycle network in the area around the Gatwick Green site is shown in **Figure 2.1**.



**Figure 2.1 – Existing Cycle Network**

2.4 The limited attractiveness to access the site on foot, by bicycle or public transport could lead to a reliance on non-sustainable modes, particularly the private car, for travel to and from the site.

**Access to the Strategic Road Network**

2.5 The Gatwick Green draft allocation does not have direct access to the Strategic Road Network, and therefore all trips accessing the site from the M23, including HGVs associated with the proposed B8 uses, will need to travel on long, indirect routes on the local highway network, adding unnecessary additional trips to the local highway network which will impact on all users.

2.6 The potential routes to and from the Gatwick Green draft allocation from the M23 are shown in **Figure 2.2** and **Figure 2.3**. The distances associated with these routes are 7.2km (amber), and 6.8km (green) – shown in **Figure 2.3**.

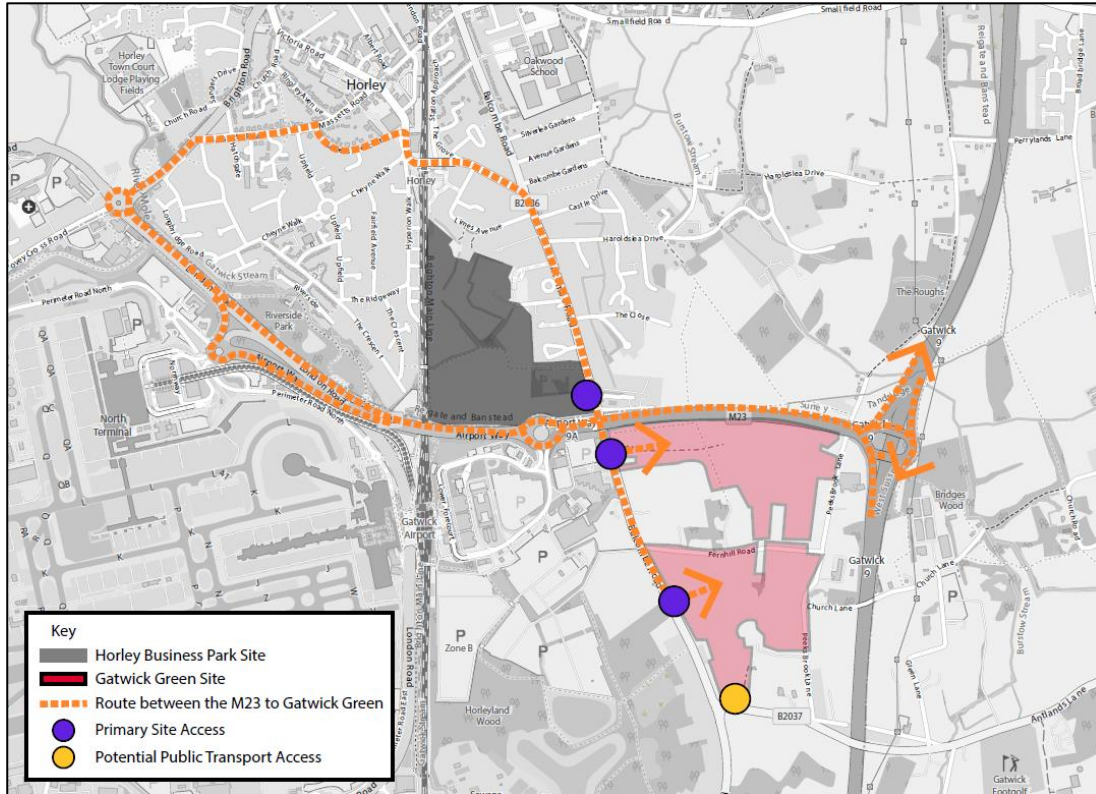


Figure 2.2: Potential Routes from/to M23 J9 to/from Gatwick Green



**Figure 2.3: Potential Routes from M23 J10 to Gatwick Green**

2.7 The potential impact on residential amenity of all vehicles routing through Crawley or Horley is a serious concern. The effect of this impact is compounded by the proposed B8 Use which will generate a significant number of heavy goods vehicles (HGVs).



### **3 Trip Generation**

- 3.1 As part of the Crawley Local Plan Review modelling a trip generation was provided based on the scheme comprising of a floorspace of 77,500m<sup>2</sup> of B8/B2. The resultant trip generation of the site was determined as 312 two-way vehicle trips in the AM peak and 281 two-way vehicle trips in the PM peak, after sustainable transport mitigation measures. This is the level of trips that informed the Scenario 2 network modelling, which included the Gatwick Green development.
- 3.2 Due to the considerable variations between the Gatwick Green floorspace assessed within the Local Plan Review modelling and the floorspaces provided within the i-Transport Gatwick Green Transport Strategy document (submitted by the Wilky Group) it is necessary to reconsider the impact of the development.
- 3.3 An estimate of the trip generation of the draft allocation has been undertaken using the industry standard TRICS database to understand the substantial number of additional trips that the local highway network would be required to accommodate in the peak hours and daily.
- 3.4 For the purpose of this exercise as a B8 use can significantly differ in its trip generation dependent on the type of proposed development trips are provided for 160,000m<sup>2</sup> of general warehousing and for 160,000m<sup>2</sup> of parcel distribution warehousing. Additionally, trips for 52,500m<sup>2</sup> of business park and 52,500m<sup>2</sup> of hotel have been estimated.



**Table 3.1 Gatwick Green Estimated Trip Generation**

	AM (08:00 – 09:00)			PM (17:00 – 18:00)			Daily		
Time Period	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Total
<b>B8 General Warehousing (160,000m<sup>2</sup>)</b>									
<b>Trip Rate</b>	0.076	0.044	0.120	0.023	0.058	0.081	0.719	0.708	1.427
<b>Trips</b>	122	70	192	37	93	130	1,150	1,133	2,283
<b>B8 Parcel Distribution (160,000m<sup>2</sup>)</b>									
<b>Trip Rate</b>	0.208	0.528	0.736	0.417	0.500	0.917	4.838	4.585	9.423
<b>Trips</b>	333	845	1,178	667	800	1,467	7,741	7,336	15,077
<b>Business Park (52,500m<sup>2</sup>)</b>									
<b>Trip Rate</b>	1.523	0.216	1.739	0.172	1.086	1.258	5.783	5.847	11.630
<b>Trips</b>	800	113	913	90	570	660	3,036	3,070	6,106
<b>Hotel (52,500m<sup>2</sup>)</b>									
<b>Trip Rate</b>	0.416	0.523	0.939	0.475	0.416	0.891	4.940	4.862	9.802
<b>Trips</b>	218	275	493	249	218	468	2,594	2,553	5,146
<b>B8 General Warehousing (160,000m<sup>2</sup>) + Business Park (52,500m<sup>2</sup>) + Hotel (52,500m<sup>2</sup>)</b>									
<b>Trips</b>	1,140	458	1,598	376	881	1,258	6,780	6,756	13,535
<b>B8 Parcel Distribution (160,000m<sup>2</sup>) + Business Park (52,500m<sup>2</sup>) + Hotel (52,500m<sup>2</sup>)</b>									
<b>Trips</b>	1,351	1,233	2,584	1,006	1,588	2,595	13,371	12,959	26,329

3.5 This assessment shows that the number of two-way vehicle trips that the Gatwick Green draft allocation can be expected to generate is:

- AM peak hour – between 1,598 and 2,584 vehicle trips;
- PM peak hour – between 1,258 and 2,595 vehicle trips; and
- Daily – between 13,535 and 26,329 vehicle trips.

3.6 A further investigation of trips indicates that for general warehousing approximately 30% of the trips that are generated will be HGVs and for parcel distribution the percentage of HGV vehicle trips would be approximately 23%. Therefore, the number of two-way HGV trips that the Gatwick Green draft allocation can be expected to generate is:

- AM peak hour – between 368 and 775 HGV trips;
- PM peak hour – between 289 and 779 HGV trips; and

- Daily – between 3,113 and 7,899 HGV trips.
- 3.7 The trip generation associated with the Gatwick Green land uses proposed within the Transport Strategy are considerably higher than those utilised within the Local Plan Review modelling and as such an assessment that considers the full impacts of the development has not been undertaken.
- 3.8 The trip generation assessed in the Local Plan Review modelling associated with the Gatwick Green site is 312 in the AM peak and 281 in the PM peak. The trip generation presented at **Table 3.1** indicates an increase of between 1,286 (412%) and 2,272 (728%) in the AM peak and 977 (348%) and 2,314 (823%) in the PM peak period.
- 3.9 The expected level of trip generation is significant, and beyond the capacity of an urban road of this type, and will materially change the character of Balcombe Road and the routes that lead from Balcombe Road. No assessment of the impact that this significant level of trip generation will have on the highway network has been undertaken and therefore, no judgement can be made on whether there are suitable and deliverable interventions that can address this impact.

## 4 Cumulative Impact of Gatwick Green and Horley Business Park on the Local Highway Network

### Horley Strategic Business Park

- 4.1 Horley Strategic Business Park (HBP) is an allocated site (HOR9) in the Reigate & Banstead Local Plan Development Management Plan adopted in September 2019.
- 4.2 Horley Strategic Business Park will provide a dedicated, direct access onto the M23. This is considered the most appropriate way to accommodate the vehicle demand for a large employment site in this location, with direct access to the Strategic Road Network and only a small, secondary access to the local highway network to accommodate local trips. The secondary access will be provided onto Balcombe Road and its use will be limited to emergency service vehicles, public transport and other sustainable transport modes and a limited number of registered vehicles of local employees using the site.
- 4.3 This access arrangement addresses the concerns of both Highways England to keep local traffic off of the Strategic Road Network, and the local highway authority, to prevent strategic traffic from rat-running on local routes. The restricted vehicular use will also encourage local trips to be undertaken by sustainable modes.
- 4.4 Providing direct access to both the Strategic Road Network and the local road network is crucial for a large scale employment site in this area. The Gatwick Green draft allocation is cut off from the Strategic Road Network and only accessible via a significant diversion through Crawley or Horley.
- 4.5 HBP is able to provide direct pedestrian / cycle access to Horley and Gatwick rail stations via existing routes (including Public Rights of Way and National Cycle Route 21) that are accessed via the western side of the development. HBP is to make a contribution to improve these routes.

### Balcombe Road

- 4.6 Due to the presence of schools and a significant number of direct accesses to residential properties and businesses on Balcombe Road it is recognised that a significant increase in vehicular traffic would increase highway safety issues along this vehicle movement corridor. The environmental impact to local residents and active travel users is also considered to have an undesirable detrimental impact if large numbers of vehicles from the Horley Strategic Business Park were enabled unfettered access along Balcombe Road. This is why access to and from Balcombe Road from Horley Strategic Business Park will be carefully controlled as set out in policy.
- 4.7 An assessment of the existing level of traffic, the estimated vehicle trips that Horley Strategic Business Park and the estimated number of vehicle trips that Gatwick Green will generate along Balcombe Road has been undertaken. Two points have been assessed; the first is north of the proposed Horley Business Park access providing an estimate of the number of vehicles through Horley and the second is between the proposed southern Gatwick Green draft allocation access and the Balcombe Road / Antlands Lane junction, providing an estimate of the additional number of vehicles that will pass through this junction. The locations of the assessment points is shown in **Figure 4.1**.

4.8 The distribution of the vehicle trips has been based on the assumed Horley Strategic Business Park distribution at its Balcombe Road access (11.5% northbound and 88.5% southbound). The results of the assessment are shown in **Table 4.1**.

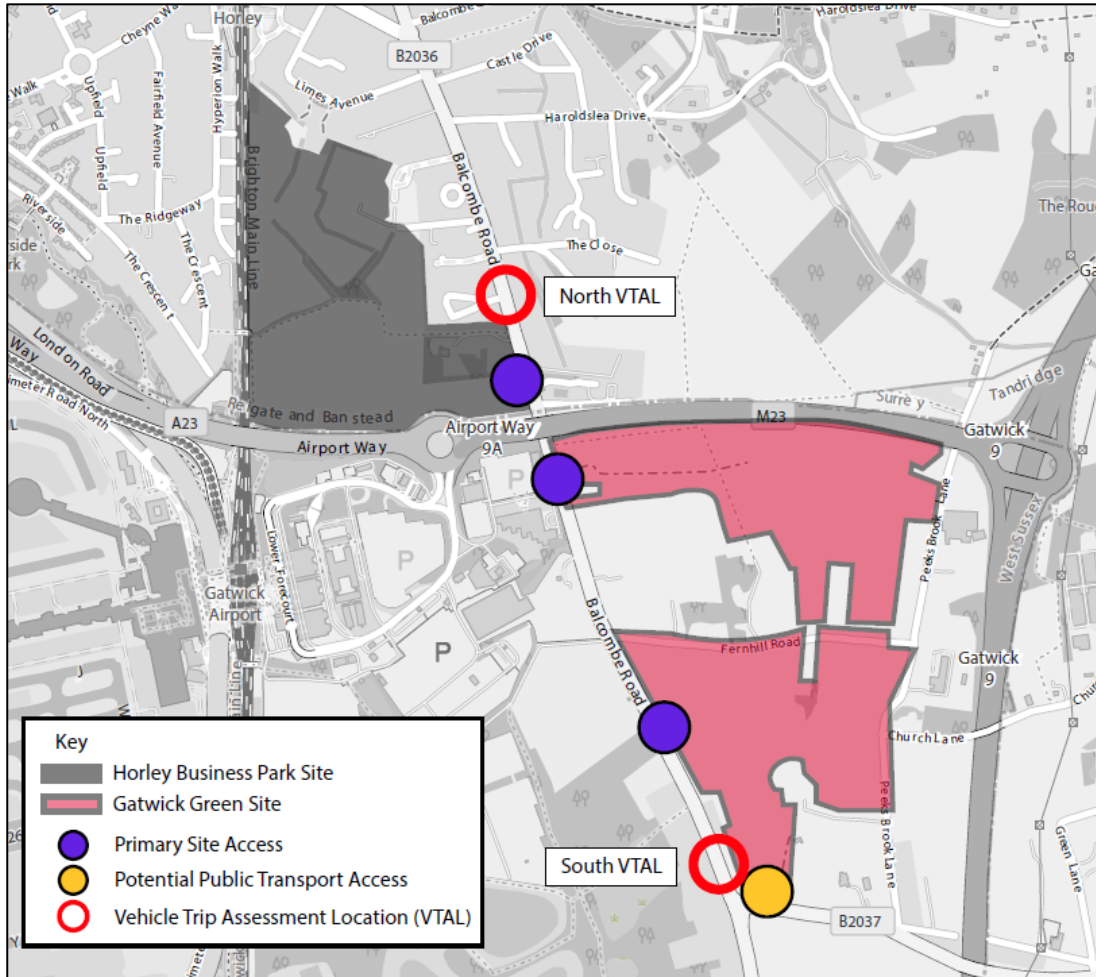


Figure 4.1: Balcombe Road - Vehicle Trip Assessment Locations

**Table 4.1 Balcombe Road Existing and Future Traffic Flows**

Time Period	Direction	Existing (2016 Survey)	Horley Strategic Business Park	Gatwick Green	
				B8 General Warehousing (160,000m <sup>2</sup> ) + Business Park (52,500m <sup>2</sup> ) + Hotel (52,500m <sup>2</sup> )	B8 Parcel Distribution (160,000m <sup>2</sup> ) + Business Park (52,500m <sup>2</sup> ) + Hotel (52,500m <sup>2</sup> )
<b>Northern Section</b>					
<b>AM Peak (08:00 – 09:00)</b>	Northbound	654	1	53	142
	Southbound	568	47	131	155
	Two-way	1,222	48	184	297
<b>PM Peak (17:00 – 18:00)</b>	Northbound	624	47	101	183
	Southbound	788	1	43	116
	Two-way	1,412	48	144	299
<b>Southern Section</b>					
<b>AM Peak (08:00 – 09:00)</b>	Northbound	611	363	1009	1,196
	Southbound	540	8	405	1,091
	Two-way	1,151	371	1,414	2,287
<b>PM Peak (17:00 – 18:00)</b>	Northbound	606	6	333	890
	Southbound	781	363	780	1,405
	Two-way	1,387	369	1,113	2,295

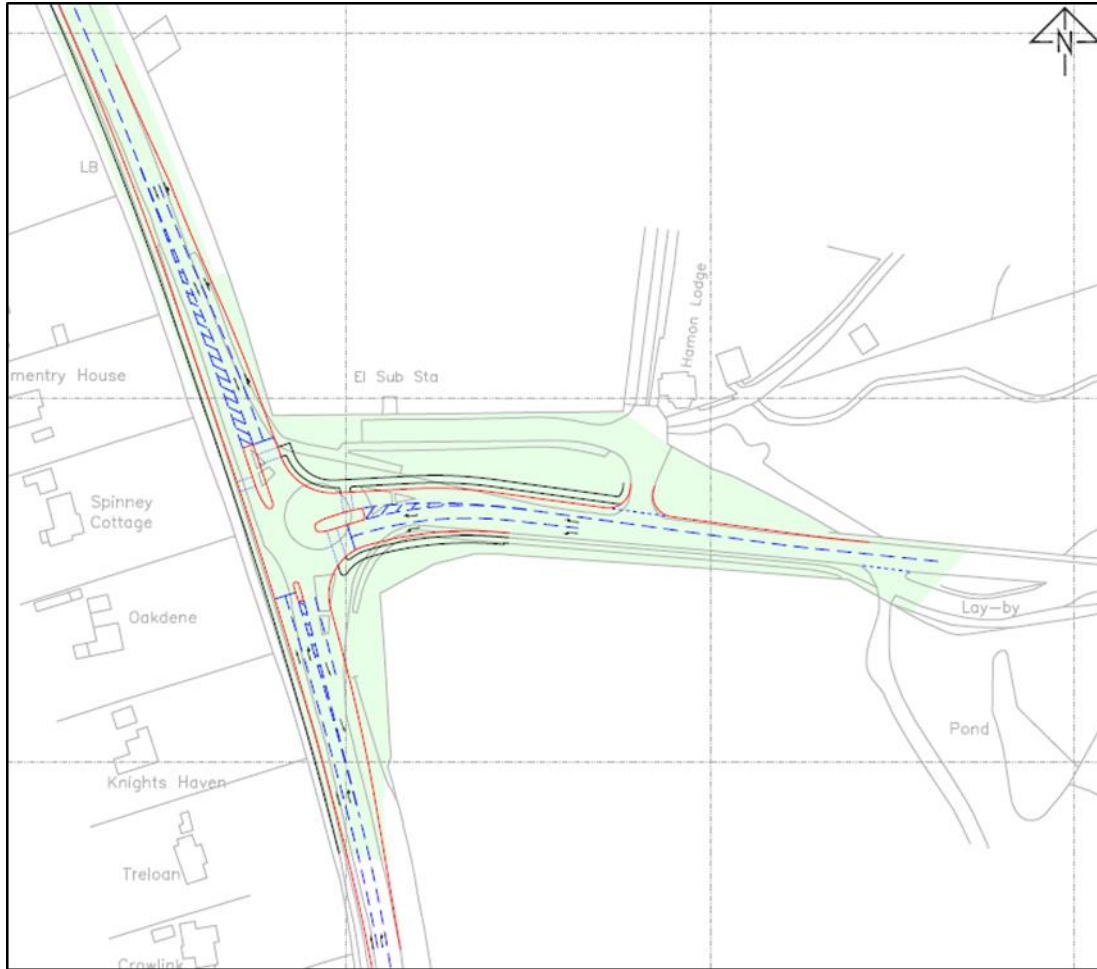
- 4.9 **Table 4.1** indicates that the number of two-way vehicles on Balcombe Road north of the Horley Strategic Business Park proposed access in 2016 were 1,222 and 1,412 in the AM and PM peaks, respectively. Horley Strategic Business Park will increase these flows by 48 in the AM and PM peaks to 1,270 and 1,460 two-way vehicles, respectively. This impact is 3.9% and 3.4% respectively.
- 4.10 The IEMA Guidelines for the Environmental Assessment of Road Traffic (IEA Guidelines) states that increases in traffic flows below 10% are generally considered to be insignificant in environmental impact terms given that daily variations in background traffic flow may vary by this amount. Therefore, it is considered that the impact of HBP on Balcombe Road as it extends towards Horley is negligible.
- 4.11 Using the expected level of traffic with Horley Strategic Business Park developed, Gatwick Green draft allocation as B8 General Warehousing is estimated to increase the two-way vehicle movements, north of the HBP access, by 14.4% in the AM peak and 9.8% in the PM peak.



- 4.12 Using the expected level of traffic with the Horley Strategic Business Park developed, Gatwick Green draft allocation as B8 Parcel Distribution is estimated to increase the two-way vehicle movements by 23.4% in the AM peak and 20.5% in the PM peak.
- 4.13 Within the IEA Guidelines, two broad rules are suggested to be used as a screening process to gauge the required environmental assessment:
- Rule 1: include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%);
  - Rule 2: include any other specifically sensitive areas where traffic flows have increased by 10% or more.
- 4.14 Given this section of Balcombe Road contains a number of schools in close proximity, a church and direct accesses from dwellings and businesses it is likely that it would be considered as a sensitive area. Therefore, Gatwick Green is expected to have a detrimental environmental impact on Balcombe Road and within Horley.
- 4.15 **Table 4.1** indicates that the number of two-way vehicles on Balcombe Road south of the Gatwick Green draft allocation proposed southern access in 2016 were 1,151 and 1,387 in the AM and PM peaks respectively. Horley Strategic Business park will increase these flows by 371 and 369 in the AM and PM peaks to 1,522 and 1,756 two-way vehicles, respectively. This impact is 32.2% and 26.6% respectively. This level of impact is on the threshold of requiring further assessment from an environmental impact perspective.
- 4.16 Using the expected level of traffic with Horley Strategic Business Park developed, Gatwick Green draft allocation as B8 General Warehousing is estimated to increase the two-way vehicle movements, north of the HBP access, by 92.9% in the AM peak and 63.4% in the PM peak.
- 4.17 Using the expected level of traffic with the Horley Strategic Business Park developed, Gatwick Green draft allocation as B8 Parcel Distribution is estimated to increase the two-way vehicle movements by 150.3% in the AM peak and 130.7% in the PM peak.
- 4.18 The level of change which will result from the Gatwick Green draft allocation could be 5 times higher than the threshold for an assessment of environmental impacts. The likely result is a material adverse impact in a range of areas including severance, pedestrian delay, pedestrian amenity, fear and intimidation, and driver delay.
- 4.19 The Gatwick Green draft allocation has the potential to result in major environmental impacts on Balcombe Road.

### **Balcombe Road / Antlands Lane Junction**

- 4.20 The West Sussex County Council SATURN model identified the Balcombe Road / Antlands Lane priority roundabout junction as a hot spot on the network and a comprehensive improvement scheme introducing a signal controlled junction was developed to accommodate the Horley Strategic Business Park development traffic, as shown in **Figure 4.2**.



**Figure 4.2: Proposed Layout of Balcombe Lane / Antlands Lane Junction**

- 4.21 Despite the identification of the Balcombe Lane / Antlands Lane junction as a hot spot on the network and in need of a comprehensive improvement scheme, the junction was not assessed within the Crawley Local Plan Review modelling.
- 4.22 The Horley Strategic Business Park identified capacity issues at this existing priority roundabout and proposes to introduce a signalised junction as shown in **Figure 4.1**.
- 4.23 A summary of the LINSIG capacity modelling results, undertaken to provide a junction suitable for 2031 with the Horley Strategic Business Park fully developed is shown in **Table 4.2**.

**Table 4.2 Balcombe Road / Antlands Avenue Junction – LINSIG Results Summary – Base 2031 + Horley Strategic Business Park**

Link No.	Lane	AM Peak Hour		PM Peak Hour	
		Degree of Saturation	Queue Length (pcu)	Degree of Saturation	Queue Length (pcu)
1/1+1/2	Balcombe Road (North)	63.1	5.1	89.3	17.8
2/1+2/2	Antlands Lane	89.6	11.2	79.6	6.2
3/1+3/2	Balcombe Road (South)	82.0	10.0	89.9	19.1

- 4.24 The junction modelling demonstrates that the proposed signalised junction can accommodate the development traffic associated with the Horley Strategic Business Park in 2031. The assessment undertook an analysis of 2,361 and 2,774 vehicle movements in the AM and PM peaks, respectively.
- 4.25 The introduction of Gatwick Green draft allocation would increase vehicle flows at this junction by 1,406 - 2,274 in the AM peak and 1,107 – 2,284 in the PM peak. This is an increase of 60-96% in the AM peak and 40-82% in the PM peak
- 4.26 An assessment of the proposed signalised junction has been undertaken for Gatwick Green. The trip generation for B8 General Warehousing and B8 Parcel Distribution has been distributed on the assumed Horley Strategic Business Park distribution at the Antlands junction. A summary of the LINSIG results is shown in **Table 4.3**.

**Table 4.3 Balcombe Road / Antlands Avenue Junction – LINSIG Results Summary – Base 2031 + Horley Strategic Business Park + Gatwick Green**

Link No.	Lane	AM Peak Hour		PM Peak Hour	
		Degree of Saturation	Queue Length (pcu)	Degree of Saturation	Queue Length (pcu)
<b>B8 General Warehousing</b>					
1/1+1/2	Balcombe Road (North)	48.8	6.3	126.5	259.0
2/1+2/2	Antlands Lane	119.8	44.4	80.4	6.5
3/1+3/2	Balcombe Road (South)	122.3	239.6	122.1	118.1
<b>B8 Parcel Distribution</b>					
1/1+1/2	Balcombe Road (North)	88.1	16.8	147.3	481.4
2/1+2/2	Antlands Lane	132.6	63.0	106.8	32.0
3/1+3/2	Balcombe Road (South)	132.9	329.9	148.0	176.4

4.27 The assessment indicates that the proposed signalised junction would have significant capacity issues if Gatwick Green were to be allocated. Important to note is the queuing on the northern arm of Balcombe Road would increase from circa 18 passenger car units (PCUs<sup>1</sup>) to between 259 – 482 PCUs. There is limited scope for further amendments in this location due to the landownership constraints. The queue on the southern arm of Balcombe Road would also increase from circa 20 PCUs to circa 177 – 330 PCUs.

### Crawley Local Plan Review Modelling

4.28 As aforementioned, modelling of a number of local junctions within Crawley has been undertaken as part of the Local Plan Review. Four scenarios have been assessed, and are summarised as follows:

- Reference Case – 2015 Baseline, plus completions between 2015-2020, plus a number of unbuilt and consented developments within Crawley and other neighbouring areas. Horley Business Park is included within this scenario.
- Scenario 1 – Reference case plus a number of employment and residential sites within Crawley Borough.
- Scenario 2 – Scenario 1 plus Gatwick Green Employment allocation.
- Scenario 3 – Scenario 2 plus additional residential and employment land.

4.29 The difference in results from scenario 1 and scenario 2 essentially shows the impact of Gatwick Green allocation.

4.30 In scenario 2, of the 39 modelled junctions, six junctions are operating over capacity. Of these, four are overcapacity in scenario 1 already. The two additional junctions that are operating overcapacity as a result of the addition of Gatwick Green traffic are the Crawley Avenue/Balcombe Road and Crawley Avenue/Ifield Avenue junctions.

4.31 It should be noted that the trip generation utilised within the modelling work is considerably lower than is expected to be generated by the site (as per quantum of development proposed in the Transport Study), and using the trip generation provided at **Table 4.1** may have resulted in considerably more over capacity junctions.

4.32 Mitigation for the Crawley Avenue/Balcombe Road junction involves signal timing adjustments to be made to make Crawley Avenue the more dominant link, it was determined that no further mitigation is required.

4.33 Mitigation for the Crawley Avenue/Ifield Avenue junction involves a local widening scheme to improve the junction to mitigate the impact of scenario 2 and scenario 3.

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<sup>1</sup> Typically, a car equates to 1 PCU and a HGV equates to 2 PCUS.

- 4.34 It is unclear what level of contribution the Gatwick Green development will make towards these identified mitigation measures, and whether these mitigation measures will be required to be in place prior to occupation of the Gatwick Green development.



## 5 Summary and Conclusions

### Summary

- 5.1 Gatwick Green has a poor level of active travel accessibility, with no direct access to Gatwick Rail Station and no bus services along its frontage. The site is considered to be in contradiction with National Planning Policy (NPPF) which places sustainability at the heart of the decision-making process.
- 5.2 Gatwick Green does not have direct access to the Strategic Road Network, and therefore all trips accessing the site from the M23, including HGVs associated with the proposed B8 uses, will need to travel on long, indirect routes on the local highway network, adding unnecessary additional trips to the local highway network which will impact on all users.
- 5.3 The vehicle trips expected to be generated by Gatwick Green is:
- AM peak hour – between 1,598 and 2,584 vehicle trips;
  - PM peak hour – between 1,258 and 2,595 vehicle trips; and
  - Daily – between 13,535 and 26,329 vehicle trips.
- 5.4 This number of vehicle trips equates to an additional vehicle trip on the highway network every 1.4 – 3.2 seconds. This level of trip generation is significant and will materially change the character of Balcombe Road and the routes that lead from Balcombe Road. No assessment of the impact that this significant level of trip generation will have on the highway network has been undertaken by the proposer and therefore, no judgement can be made on whether the impact can be addressed.
- 5.5 The level of traffic that will be generated by the Gatwick Green development is considerably higher than the trip generation utilised within the Local Plan Review modelling work, which indicates that Gatwick Green will generate up to 312 two-way trips in either peak hour.
- 5.6 As such, the local junction modelling work undertaken does not fully assess the potential impacts of the Gatwick Green development and is likely to have underestimated the level of mitigation required within the local highway network.
- 5.7 Balcombe Road, north of the M23, contains a number of schools in close proximity, a church and direct accesses from dwellings and businesses and therefore is considered to be a sensitive area. The increase in traffic, due to Gatwick Green, on this section of Balcombe Road is expected to be between 9.8% and 23.4%. Using the IEMA Guidelines Rule 2 as a yardstick it is expected that Gatwick Green will have a detrimental environmental impact on this built-up section of Balcombe Road and within Horley.
- 5.8 The increase in traffic, due to Gatwick Green, on Balcombe Road is expected to be between 63.4% and 150.3%. Using the IEMA Guidelines Rule 1 as a yardstick this level of change could be five times higher than the threshold for an assessment of environmental impacts.

- 5.9 The likely result of the increase in traffic is a material adverse impact in a range of areas including severance, pedestrian delay, pedestrian amenity, fear and intimidation, and driver delay. The Gatwick Green draft allocation has the potential to result in major environmental impacts on Balcombe Road.
- 5.10 An assessment of the proposed signalisation of the Balcombe Road / Antlands Drive has been undertaken to understand the affect that the Gatwick Green draft allocation would have on its operation.
- 5.11 The assessment indicates that the proposed signalised junction would have significant capacity issues if Gatwick Green were to be allocated with queues of between 259 – 482 PCUs on the northern arm of Balcombe Road where there is limited scope for further amendments due to the landownership constraints. The residual impact is expected to be severe. The draft allocation of Gatwick Green is considered to be in contradiction with NPPF which requires development to mitigate its impact and for development which would have a severe residual cumulative impact to be prevented.

### **Conclusion**

- 5.12 The Gatwick Green draft allocation is considered to have limited ability to facilitate journeys by active travel or public transport, is expected to have a severe impact on the operation of the highway network and the potential to result in major environmental impacts on Balcombe Road.
- 5.13 The impact of the Gatwick Green allocation is significantly underestimated within the Crawley Local Plan Review modelling work.
- 5.14 Paragraph 35 of the NPPF sets out the tests of soundness for which all Local Plans are assessed against. The assessment undertaken within this note has demonstrated that on the basis of highways and traffic analysis that the proposed Gatwick Green allocation is unsound and should not be taken forward.
- 5.15 In particular, it is of the view that the proposed allocation fails the test of effectiveness in that the effects of proposed allocation have not been fully considered and would have a wider effect than set out in the evidence base.
- 5.16 In addition, we consider that the proposed allocation is not consistent with national policy as it would not enable the delivery of sustainable development.
- 5.17 It is on this basis that it is requested that the proposed allocation of Gatwick Green should be removed from the Crawley Local Plan Review (Regulation 19) Submission Publication document.

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