

**Crawley Local Plan 2024-2040 Examination  
Matters, Issues and Questions (MIQs)**

**Matter 10: Transport and Infrastructure  
National Highways' Statement**

**Issue 1: Whether the approach to transport infrastructure to support the plan's proposals is soundly based**

***Q.10.1: Is it necessary for soundness that the submitted Plan content be amended to reflect the recent DfT Circular 01/22 in terms of ensuring transport demand on the strategic road network is minimised through positive visioning for development sites and interventions to support modal shift? Reference was made on submission to undertaking a checklist exercise in respect of Circular 01/22, is that likely to indicate any potential main modifications?***

1. National Highways (NH) in our response to the consultation on the Regulation 19 Plan made the point that DfT Circular 01/22 represents government policy, alongside the National Planning Policy Framework. In order to demonstrate consistency with national policy (a soundness test for the examination of the Plan) it is necessary for the Plan to respond sufficiently to the expectations of 01/22.
2. NH welcome 'Crawley: A Vision' which accords with the expectation in 01/22 of a vision-led approach to development. However, this needs to be supplemented with visions for the larger proposed allocations. NH made this point in our

response to Matter 4, Issue 3, q.4.27 in respect of the Strategic Employment Location at Gatwick Green (Policy EC4) and during the part 1 Hearing sessions.

3. The Council initially responded (post-submission) with the drafting of the 01/22 checklist. This was suggested by NH for the benefit of the Council and the examination inspectors to help demonstrate consistency of the Plan with this national policy. The draft checklist was shared with NH. Our response was that we were satisfied with the approach and structure.
4. Following the conclusion of the part 1 Hearing sessions, the Council shared with NH proposed modifications to Policy EC4 to address the need for a vision-led approach to the development of the strategic employment allocation. NH has fed back comments to ensure consistency with the language of the Circular.
5. The combination of 'Crawley: A Vision', the 01/22 checklist, and the proposed modifications to EC4 provide evidence that the Local Plan is sufficiently consistent with the expectations of DfT Circular 01/22.

***10.2 Is the Infrastructure Plan sufficiently clear and effective on likely mitigation required to the strategic road network (M23 and A23) as a consequence of the proposals and policies in the Plan over the period to 2040?***

6. In terms of likely mitigation required, the Infrastructure Plan (July 2023) is clear on what is required to the Strategic Road Network (SRN), specifically for the M23 Junctions 10 and 11.
7. However, as highlighted in NH's response to the consultation on the Regulation 19 Plan, the Infrastructure Plan lacks details on when this mitigation is required and how this relates to the trajectory for the build-out of the development strategy in the Plan. This was a point made by NH to the Council back in the Spring 2023,

when a draft version of the Infrastructure Plan was shared.

8. Post-submission of the Local Plan, the Council prepared an Infrastructure Delivery Schedule (IDS). This was shared with NH for comment. NH's initial feedback was that the IDS was welcomed although clarity needed to be provided on National Highways role. NH proposed the following text which has been inserted at the beginning of the IDS:

*National Highways' involvement – For those schemes where National Highways (NH) is listed under "Other relevant organisation(s)", NH's role will be as the organisation responsible for the Strategic Road Network (SRN). NH will be consulted on the details of the proposed schemes prepared by third parties, eg developers, and will be responsible for overseeing the necessary assessments and checks to ensure the schemes are acceptable in terms of their impacts on the safety, reliability, and operational efficiency of the SRN. The implementation of each scheme affecting the SRN will be governed by a legal agreement between the developer and NH.*

9. This is an important addition to the IDS. Any necessary mitigation to the SRN arising from the Crawley Local Plan needs to be addressed by the Local Planning Authority (LPA) through the Local Plan-making process. This includes identifying how the mitigation will be funded, who will promote and deliver the schemes, and when they will be implemented alongside the build-out of the development strategy. These mitigation schemes would need to be delivered by third parties, not NH. National Highways Licence agreement is with the Government, and the Government's priorities for the SRN are set out in the Road Investment Strategy (RIS), with RIS2 (2020-2025) being the current strategy. Schemes that do not feature in RIS which are the result of development strategies in emerging Local Plans must be delivered by third parties. How this will be achieved is the responsibility of the LPA through the preparation of the Local Plan.

10. National Highways has continued to work with the Council on refining the IDS. This has included a request to include cumulative completions of housing and employment development to help paint a clearer picture of the build-out of the development strategy and how this relates to the phasing of the supporting infrastructure. Furthermore, NH has requested clear dividing lines between the short, medium and long-term periods of the Plan. The Council has been receptive to these suggestions.
11. However, neither the submitted Local Plan documents nor the IDS have been supported by detailed evidence justifying the specific phasing of the mitigation schemes for the SRN. The dates for delivery of infrastructure do not appear to be objectively tied to the delivery of housing and employment floorspace within the Local Plan. In the interests of safety and operational efficiency, National Highways requires necessary mitigation schemes to be in place and open to traffic at the appropriate time, justified by evidence. The Infrastructure Delivery Schedule should link the implementation timescales of the mitigation schemes to the additional traffic that would be generated by the cumulative levels of development (commitments and Local Plan allocations) which would require the schemes to be in place.
12. In the absence of the evidence, the Infrastructure Plan (including the IDS) is not sufficiently clear and effective on likely mitigation required to the SRN as a consequence of the proposals and policies in the Plan over the period to 2040. However, this could be resolved during the examination phase of the Local Plan. This issue could be resolved by further assessment to demonstrate that traffic levels at M23 Junctions 10 and 11 would not lead to additional safety risks prior to infrastructure implementation. Alternatively, the Plan could be amended to enable a “monitor and manage” approach to development and infrastructure provision. Such an approach would need to link the need for infrastructure to

actual travel demand changes to ensure that the pace of development accords with the ability of the Strategic Road Network to safely accommodate traffic flows. This could fall within the scope of the Transport Infrastructure Management Group, as proposed by the Council. More details of this group, including terms of reference, need to be provided. National Highways is happy to be consulted on the evidence.

***Q.10.3: Does the fact the Crawley Transport Modelling Study is to 2035, whereas the plan period is 2040, indicate a level of uncertainty about impacts on transport infrastructure in the latter part of the plan period? Does the additional sensitivity testing to 2040 demonstrate that highway impacts attributable to the plan's policies and proposals have been appropriately considered over the totality of the plan period and a robust baseline (worst case scenario) established from which to develop mitigation approaches?***

13. National Highways are content that the levels of development in the Local Plan and the Transport Study have been adequately aligned. We are content that the modelling reported in the Transport Study has included sufficiently robust assumptions on levels of development and development related traffic to match the Submission Local Plan stated levels of development (subject to further justification should the development earmarked in Strategic Policy EC4 be increased). We are also content that the sensitivity testing to 2040 (based upon updated population forecasts since the Transport Study was produced) has sufficiently demonstrated that the levels of background traffic growth in the Transport Study to 2035 are sufficient to act as a proxy for a 2040 scenario.
14. The findings of the Transport Study to 2035 are therefore applicable for proposed development to 2040. The outstanding concern as per our response to MIQ10.2 (see above) is the uncertainty that the proposed mitigation will be implemented when required due to a lack of justification provided for the implementation

timescales of the proposed mitigation schemes at M23 Junctions 10 and 11 in the IDS.

**Issue 3: Whether there is sufficient infrastructure capacity or scope for planned improvements to support the plan's proposals and secure sustainable growth**

***Q.10.15: With reference to the Infrastructure Plan (Document KD.IP.01), is the Plan based on a sound assessment of existing infrastructure capacity and future infrastructure requirements to ensure the plan's growth would be sustainable?***

15. National Highways are content that the Infrastructure Plan lists the requirements identified within the Local Plan Transport Study which are necessary to safely accommodate the additional traffic arising from the Local Plan as fully built out to 2035/6 and that the study findings approximate to full build out at 2040.
16. As set out in our response to Question 10.2 (see above), neither the Infrastructure Plan nor the Infrastructure Delivery Schedule provide sufficient evidence on when during the plan period the infrastructure at M23 Junctions 10 and 11 is likely to be required alongside the build-out of the development strategy.

***Q.10.21: Is the Infrastructure Plan sufficiently clear on highway mitigation in terms of the projects required over the plan period to ensure the potential impacts on the road network arising from the plan's policies and proposals can be addressed? Is there clarity in respect of identified highways projects as to who will lead on their delivery, what they will cost and potential sources of funding?***

17. For the M23, the Infrastructure Plan, while being clear on the identified improvements (Junctions 10 and 11) necessary to support the development strategy in the submitted Local Plan, does not provide clarity on who will lead on delivery.
18. The initial draft of the IDS prepared by the Council and shared with NH for comment lists 'National Highways' as one of the 'Lead Organisations' against the three mitigation schemes for the M23 Junctions 10 and 11. In response, NH made it clear to the Council that these mitigation projects would need to be promoted, funded and delivered by third parties – please also see our response to Q.10.2. NH's role will be as the organisation responsible for the Strategic Road Network (SRN). NH will be consulted on the details of the proposed schemes prepared by third parties, eg developers, and will be responsible for overseeing the necessary assessments and checks to ensure the schemes are acceptable in terms of their impacts on the safety, reliability, and operational efficiency of the SRN.
19. The Council has responded by capturing this important text at the beginning of the IDS. Furthermore, National Highways have been removed from the 'Lead Organisation' column in the IDS for these schemes. The latest iteration of the IDS (December 2023) shared by the Council recognises that it (the Council) has to be the lead organisation for the M23 Junction 10 southbound merge and the M23 Junction 11 northbound diverge and merge schemes, being the LPA responsible for preparing the Local Plan that has given the rise to the need for these improvements. In respect of the M23 Junction 10 roundabout signalisation scheme, the IDS states 'Developer' as the lead organisation which is vague given that it is listed as a committed scheme.
20. For clarity, National Highways is not leading on the implementation of the

mitigation schemes for the SRN that are necessary to support the development strategy in the submitted Local Plan. This is the responsibility of the LPA as the organisation who has prepared the Local Plan.

21. In terms of the phasing of the mitigation schemes alongside the trajectory for the build-out of the Local Plan development strategy, please see our response to Q.10.2 (above).
22. Costs and potential sources of funding are matters for the Council to address as the organisation responsible for preparing the Local Plan which has given rise to the need for the highway mitigation. National Highways are concerned about the safety, reliability, and operational efficiency of the SRN. Our focus is on ensuring that the necessary mitigation to support the development strategy in the Local Plan is identified. The evidence supporting the Local Plan shows that the identified mitigation schemes for the SRN are necessary to safely accommodate the traffic on the SRN that is likely to arise from the development included within the Plan.

***Q.10.23: How will the highway works to Ifield Roundabout and M23 Junctions 10 and 11 slip roads as identified in the Transport Study be funded? Is there a timeframe for their delivery? Is there any initial, in-principle understanding, proportionate to plan-making, that these interventions would be deliverable? When are they needed within the plan period?***

23. As highlighted in our response to Q.10.21 (see above), funding is matters for the Council to address as the organisation responsible for preparing the Local Plan which has given rise to the need for the highway mitigation.
24. The Infrastructure Plan that was published alongside the Regulation 19 Plan does not provide sufficient detail on the timeframe for their delivery. This is a



point National Highways made in our response to the consultation on the Regulation 19 Plan – please also see our response to Q.10.2 (above).

25. The preparation of the Infrastructure Delivery Schedule (IDS) by the Council post-submission of the Local Plan does provide some detail on the timeframe for the delivery of these mitigation projects, although this does need to be substantiated with additional evidence and further details of the role of the proposed Transport Infrastructure Management Group in overseeing their implementation (see our response to Q.10.2 (above)).

***Q.10.26: Is Policy IN2 a sound approach to securing infrastructure delivery through contributions from development where mitigation is required?***

26. As highlighted in our response to Q.10.21 (see above), funding is a matter for the Council to address as the organisation responsible for preparing the Local Plan which has given rise to the need for the highway mitigation. It is the responsibility of the Council to ensure that essential infrastructure to support the development strategy in the Local Plan is delivered when required.

### **Issue 3: Updated evidence on Transport and Infrastructure Delivery**

#### **Infrastructure Delivery Schedule – CBC.KD.IP.07**

***SQ.10.36: Various mitigations to M23 Junctions 10 and 11 are identified as ‘critical’ with Forge Wood related improvements already funded but with further longer term mitigations to support overall Local Plan growth assigned from 2030 onwards. Are the costs for both junctions agreed with National Highways based on a high-level understanding of what would form effective mitigation? Is it reasonable that the costs (cumulatively £5.076million) would be fully funded***

**from CIL?**

27. The mitigations at M23 Junctions 10 and 11 have been determined by traffic modelling with the Local Plan looking at additional flows and the implications for the safe and efficient operation of the SRN. The above cost refers to the changes to the merges and diverges at the two junctions. These are based upon modifications which are necessary to ensure that road safety risk is not unacceptably increased with the Local Plan development in place. The designs of the necessary junction alterations are in accordance with the Design Manual for Roads and Bridges CD122 The Geometric Design of Grade Separated Junctions.
  
28. As highlighted in our response to Q.10.21 (see above), funding for these schemes and how this is secured are matters for the Council to address as the organisation responsible for preparing the Local Plan which has given rise to the need for the highway mitigation.