

Crawley Borough Council 2024-2040 Local Plan Examination MIQs Matter 10 - Issue 2: 10.8, 10.10, 10.14

Report date: December 2023

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Matter 10: Transport and Infrastructure

Issue 2: Whether the plan's approach to Crawley Western Multi-Modal Transport Link at Policy ST4 is sound?

10.8 **Is the principle of an area of search justified? Is it necessary for plan soundness, having regard to the evidence base (documents at ES/ST/02 - the various SYSTRA reports), that a narrower area of search or preferred option for the route alignment is identified?**

1. Para 17.20 states that a new CWMMTL is required given that a number of junctions within the borough are already at capacity. This is also as a result of the quantum of development coming forward across other LAs and Gatwick Airport's masterplan 2019. Para 17.21 suggests that further strategic transport assessment which deals with cumulative impacts of development is necessary and therefore CBC consider is appropriate to identify an area of search for the CWMMTL.
2. Policy ST4 identifies the area of search connecting the A264 with the A23 and that including bus priority measures whilst ensuring connectivity by non-vehicular modes of transport with local neighbourhoods and beyond.
3. The Area of Search is stated under Policy ST4 as being required given the significant degree of change and development possible from Horsham DC and Gatwick Airport, and as result of potential traffic capacity at key junctions.
4. A Relief Road to the North East of the Borough has been discussed for decades, and it is accepted that the principle of a "relief road" or multi modal link is therefore justified.
5. However, our previous representations have consistently recommended that a narrower area of search, or preferred option for the route alignment, is identified. As part of the Local Plan Review Evidence Base, further assessment has been undertaken by SYSTRA of various alignment options.
6. However, despite SYSTRA's work, there is still unnecessary ambiguity regarding the extent and corridor of the area of search, despite highest scoring route options ES3 and ES3a being identified. Therefore, the blanket approach to safeguarding the extent of land shown for the CWMMTL under Policy ST4 is neither justified nor effective and is unsound.
7. To support the Local Plan, CBC instructed Stantec to produce the "Crawley Transport Modelling Study" (ES/ST/01a), and SYSTRA to produce ES/ST/02a "Crawley Western Link Road Study." Whilst, as set out above, the SYSTRA work identifies two highest scoring route options, these are not supported in the policy text of ST4.
8. The evidence base by SYSTRA (ES/ST/02a – Northern Section Area of Search Study para 4.1.2) sets out the design criteria for the CWMMTL as follows:
 - All-purpose dual carriageway multi-modal link inclusive of one traffic lane and one bus lane in each direction;
 - 70kph design speed (40mph speed limit) which may be reduced to meet requirements of surrounding areas i.e. County Oak Industrial Area;
 - Each carriageway 7.3m wide consisting of two 3.65m wide lanes, one lane for general traffic and one for public transport;
 - 2m central median is provided between the carriageways; and
 - 3m planting strip, 2.5m walking infrastructure, and 3.5m cycling facilities provided on each side of the carriageway.
9. The evolution of the Jersey Farm site masterplan has been designed cognisant of these design criteria.

10. Given the location of the Jersey Farm site on the boundary of Crawley and its interrelationship with land proposed at the West of Ifield site in Horsham District, the Jersey Farm project team have been working closely together with Homes England on alignments and connections. We have shared our masterplan and have had regular meetings to ensure that both proposals could complement each other, in regard to layout and transport links.
11. We have reviewed Appendices A-J of the SYSTRA report (which look at the detailed alignment and costings of the proposed routes), the Statement of Common Ground with Horsham District Council (SOCG/07), and the reasoned justification around Policy ST4, which show that HDC and CBC have been working closely together on route alignments. We support this essential cross-boundary working.
12. In order to identify a narrower area of search, the SYSTRA study divides the northern section of the CWMMTL route into three parts. It considers a total of 19 options for the route of the eastern end of the CWMMTL northern section, including two options which pass through the Jersey Farm site. These are named Option ES3 and ES3a.
13. Option ES3a is the highest-scoring of the route options and is the most closely-aligned of the 19 route options to that which is proposed in the Jersey Farm masterplan (albeit that the public transport is routed via County Oak Way which has width constraints) however, as ES3a diverts the public transport route along County Oak Way, it is reasonable to assume that the easternmost section of the CWMMTL would require a reduced land take due to reduced width. The report acknowledges that there are clear benefits to this route option, but with a caveat that it encroaches into the safeguarded land by c.155m.
14. The second-highest-scoring route option, ES3, is also very similar to that shown in the Jersey Farm masterplan. The SYSTRA report also acknowledges encroachment into safeguarded land for the airport by 155m.
15. Therefore, SYSTRA's report on the CWMMTL identifies the best performing option for the route. That route can be delivered and will complement the delivery of the Jersey Farm employment site.
16. Para 17.28 confirms that the route options identified in the SYSTRA study are indicative only, however, this is ambiguous, and a narrower area of search reflecting the "preferred option" or the highest-scoring route option(s) should be identified both in the policy ST4 and on the proposals map.
17. In regard to other updates that may affect Policy ST4, the HDC District Plan Regulation 19 draft document will be discussed at an Extraordinary Meeting on 11th December 2023. In addition, the published draft document as part of the agenda papers for Regulation 19 Horsham District Plan proposes to allocate Land West of Ifield, and under development management updates, an EIA has been submitted to HDC for the site.
18. Whilst the SYSTRA evidence base is sound, we do not accept the soundness of the Policy ST4 as it fails to specify an effective and justified Area of Search/route alignment indicated on the Proposals Map to reflect the SYSTRA work. Policy ST4 in its current form still retains a significant area to be safeguarded, the extent of which is not justified nor consistent with the SYSTRA report in the Evidence Base, and therefore Policy ST4 should be modified to reflect a narrower Area of Search, or preferred route alignment (reflecting the highest-scoring CWMMTL route options ES3 and ES3a).
19. In addition, Policy ST4 in its current form is inconsistent with Policy GAT 2, which seeks to safeguard land for a possible future southern runway (see Ardmore's representations on GAT2 and the SA). (Both operate to blight the land they cover, preventing sustainable development.)

20. Additional clarity over the status of the area to the south of any CWMMTL also needs to be provided, in regard to whether continued safeguarding of the area south of the road, and the extant built-up area boundary, can be justified.
21. We also note that, as part of the Examination, an additional sensitivity test (ES/ST/01w) has been completed by Stantec to test the cumulative impact of the Gatwick Airport northern runway project and the CBC Local Plan traffic.
22. CBC's response to MIQ 5.10 (relating to traffic modelling the northern runway project) implies that simply optimising the timing of traffic signals at the overcapacity junctions will suitably mitigate the cumulative impact. However, at this stage, it is unclear whether solely optimising the traffic signals will achieve the level of mitigation required.
23. Further, the northern runway project sensitivity test (ES/ST/01w) only tests Scenario 2 of the Crawley Transport Study, which includes the CBC Local Plan developments (including Gatwick Green) plus the NRP DCO. Scenario 2 of the Crawley Transport Study does not include the strategic development West of Crawley and/or the CWMMTL.
24. Therefore, the cumulative scenario of CBC's Local Plan (including the Gatwick Green strategic employment site), the strategic development West of Crawley, and the Gatwick Airport northern runway project, has not been tested.
25. In summary, Policy ST4 is not sound in its current form and should be amended to ensure soundness of the Local Plan, and that the CWMMTL is required and adequate for all forms of development both within and outside of Crawley. Any safeguarded area under Policy ST4 should be limited to reflect a narrower Area of Search, or a preferred route alignment, as assessed in the LP evidence base.

Issue 2: Whether the plan's approach to Crawley Western Multi-Modal Transport Link at Policy ST4 is sound?

10.10 Would a route within the area of search be deliverable in principle and would Policy ST4 be effective in securing its delivery?

1. We agree that a route within the Area of Search under Policy ST4 is deliverable in principle, subject to the continued co-operation and agreement between CBC and HDC as stated in the SOCG (SOCG/07), and WSCC as the Local Highway Authority. We also agree that there is a practical route for the delivery of the CWMMTL as part of the Jersey Farm employment site, aligning with the highest-scoring of the route options identified under the SYSTRA study (ES/ST/02a).
2. However, uncertainty and inconsistency occur with regard to alignment and deliverability, particularly in regard to safeguarding. This is emphasised by the SOCG/07 with HDC: *"f: The parties are engaging with WSCC and Gatwick Airport regarding the boundaries of safeguarding, especially in the vicinity of the multi-modal sustainable transport corridor link along the southern boundary of the airport."*
3. In regard to detailed design and delivery of the CWMMTL, the SYSTRA study (ES/ST/02a) sets out the design criteria for the CWMMTL as follows:
 - All-purpose dual carriageway multi-modal link inclusive of one traffic lane and one bus lane in each direction;
 - 70kph design speed (40mph speed limit) which may be reduced to meet the requirements of the surrounding area i.e. County Oak Industrial Area;
 - Each carriageway 7.3m wide consisting of two 3.65m wide lanes, one lane for general traffic and one for public transport;
 - 2m central median is provided between the carriageways; and
 - 3m planting strip, 2.5m walking infrastructure, and 3.5m cycling facilities provided on each side of the carriageway.
4. The Jersey Farm masterplan includes a new access road west of the A23 London Road which has been aligned to facilitate the future provision of the CWMMTL, such that the Jersey Farm access road can meet these criteria and form part of the CWMMTL. This land will be safeguarded within the Jersey Farm Masterplan to allow the CWMMTL to connect to the access road from the West of Ifield development proposed under the HDC Regulation 19 District Plan.
5. The Jersey Farm masterplan (version P3 at appendix 1 to Ardmore's Response to MIQX) has been designed to allow the access road to be widened to accommodate bus lanes and pedestrian/cycleways to be consistent with the anticipated design of the CWMMTL.
6. In SYSTRA's ES/ST/02a section 5.3 states 19 options were considered in the eastern section of the area of search study. The study indicates a number of potential examples where the route could fall outside of the safeguarded land completely. However, many of these routes would have significant adverse impact on the Main Employment Area at Manor Royal, unsustainably requiring the removal of land in existing productive employment uses, disrupting or destroying existing businesses, and further reducing an already very constrained supply of employment land in the borough.
7. In particular, delivery of options ES1 and ES2, and ES4 – ES19 (i.e. all options other than ES3 and ES3a) would require removal of between 4 and 10 existing commercial properties, reducing much-needed employment space in a highly-sustainable location and disrupting existing business operations. Given the scale of impact and funding required for the scheme, and the necessary compensation etc, we do not consider these options to be deliverable or viable.

8. Section 7.9.4 of the SYSTRA report cites feasible options for the Eastern Section as ES1, ES2, ES3, ES3a, ES12 and ES17. However, as set out above, of these options, only ES3 and ES3a do not require the removal of existing commercial buildings.
9. In addition, the SYSTRA study also suggests that some of these routes could be for an *interim* period only, unless and until such a time when a southern runway is pursued by Gatwick Airport. However, this further demonstrates the unsustainable nature of such route options and there is no evidence that it would be deliverable or viable to construct an interim CWMMTL route, before creating a finalised route in due course. Further, the adverse impact, disruption and ambiguous signals to investors, land owners and occupiers that would be caused by such interim measures would be substantial and unjustified.
10. Therefore, the uncertainty relating to the principle and extent of safeguarding under GAT2, the large Area of Search currently stated in ST4, and the timing of the route provision, mean that Policy ST4 is not positively prepared, is not justified, nor effective or deliverable, and is not consistent with national policy. Accordingly, the policy is unsound.
11. The Jersey Farm masterplan and new access road have been designed to facilitate the future provision of the CWMMTL, aligning with the best-performing routes ES3 and ES3a. The Jersey Farm access road could therefore ultimately form part of the CWMMTL. Land within the Jersey Farm site will be safeguarded to allow the CWMMTL to connect to the access road from the west, and to allow the access road to be widened to accommodate bus lanes and pedestrian/cycleways to be consistent with the anticipated design of the CWMMTL.
12. The SYSTRA report (ES/ST/02a) acknowledges that there are clear benefits to the route options ES3 and ES3a, but with a caveat that it encroaches into the safeguarded land for the airport by c.155m.
13. The highest-scoring route option, ES3a, is also very similar to that shown in the Jersey Farm masterplan, but with the public transport route diverting along County Oak Way, which has width constraints. The SYSTRA report also acknowledges encroachment into safeguarded land for the airport by 155m, however, as ES3a diverts the public transport route along County Oak Way, it is reasonable to assume that the easternmost section of the CWMMTL would require a reduced land take due to reduced width.
14. Ardmore Ltd has been working with Homes England throughout the development of the Jersey Farm Masterplan to ensure that any development at Jersey Farm is consistent with proposals to be considered at Land West of Ifield, under the delayed HDC Regulation 19 draft, going to committee in December 2023.
15. In regard to deliverability, in section 7 of the SOCG/07 with HDC, both LPAs agree that *“7(f) The parties will work together, with the Highways authority to ensure that any masterplan prepared by the site promoter secures an effective transport strategy to serve the development. This will deliver a multi-modal sustainable transport route that delivers active travel options and mitigates adverse impacts of traffic flow into Crawley. The new route must not be an obstacle to the delivery of a comprehensive new corridor link to the west of Crawley, that would connect the A264 near to Faygate to the A23 north of County Oak”*.
16. Whilst Policy ST4 provides a significant Area of Search, the evidence base by SYSTRA for CWMMTL (ES/ST/02 “Crawley Western Link Road Study”) justifies a narrower Area of Search, or preferred route alignment that reflects the best-performing routes, and align with the Jersey Farm Masterplan.
17. A further indication of the lack of effectiveness of ST4 is that there has been no discussion between Ardmore Ltd and CBC, on the delivery of any such route, despite Jersey Farm being within the area of search identified and able to provide part of the best-performing route(s) identified in the SYSTRA evidence base, and Ardmore’s willingness to engage constructively.

18. Paragraph 17.31 of the explanatory text to Policy ST4 states that *“There may be a need for land to be compulsory purchased in order to deliver the scheme once a route has been defined.”* Therefore, it would be expected that any policy ST4 wording and area of search would be deliverable and at least initial conversations should have been undertaken to ensure that the site is deliverable, available, and achievable. In addition, any CPO requirement should be minimised, and this is not evident from the wording of the current ST4, and therefore it is not effective in securing the delivery of the CWMMTL.
19. The ST4 Area of Search is also inconsistent with the proposed GAL safeguarding area in GAT2 – see Ardmore’s representations on GAT 2 and the SA. Therefore, in its current form, Policy ST4 is not justified, effective, or deliverable. (Both operate to blight the land they cover, preventing sustainable development.)
20. Para 17.27 of the Local Plan review only deals with this at an ineffectively high level, and states that *“The proposed Area of Search partially overlaps the area of land safeguarded for a potential future southern runway at Gatwick Airport. The council is engaging with Gatwick Airport and West Sussex County Council about the partial overlap of these two areas, with the aim of minimising the impact on residents living close to the route and reducing the need for land to be compulsorily purchased.”* Therefore, despite the submission of the plan, and the underpinning SYSTRA work, neither the principle nor the alignment of the route is properly identified, or agreed, and the deliverability of the road remains uncertain and ambiguous.
21. In particular, paras 17.28 and 17.29 do not demonstrate delivery in principle, nor effective delivery mechanisms, instead they state that further work is required.
22. Therefore, ST4 is inconsistent with GAT2, which continues to safeguard land in the Area of Search for a possible future runway; unless and until CBC decides it needs safeguarded land for employment/road use. This inconsistency of approach is unsound, especially when considering the ELT(EGSM/EG/01), ELAA (EGSM/EG/02 and SA (KD/SA/01) which confirm that sustainable locations for employment have apparently been ruled out of fair and proper assessment, on the sole basis that they are within the Gatwick safeguarding area (see our Responses on MIQ 5.2).
23. Policy ST4 is currently unsound in regard to the wide area of search identified and should be amended to identify a narrower Area of Search or preferred route alignment that reflects the highest-scoring options as identified by SYSTRA (ES3 and ES3a), either of which avoids CBC having to resort to any so-called “interim solution”, or require the removal of existing commercial properties. Therefore, in its current form, Policy ST4 not effective in securing delivery of the CWMMTL and is unsound.

Matter 10: Transport and Infrastructure

Issue 2: Whether the plan's approach to Crawley Western Multi-Modal Transport Link at Policy ST4 is sound?

10.14 Is it necessary for soundness for Policy ST4 to require a multi-modal link west of Crawley to have regard to land safeguarded at Gatwick Airport at part a of the policy?

1. If (contrary to Ardmore's representations on GAT 2), the principle of safeguarding is found sound, then it is necessary for ST4 to require the CWMRTL to have regard to the extent of land safeguarded at Gatwick Airport. At present, GAT2 and ST4 inconsistently overlap because of the wide extent of the safeguarded area and the Area of Search under ST4.
2. The SYSTRA evidence base under ES/ST/02a demonstrates considerations of options, with many adversely affecting the existing commercial buildings or infrastructure (see our response on MIQ 10.10). The report highlights best-performing routes and therefore clarity is now required to enable a smaller, focused, area of search /route alignment, with safeguarding amended under GAT 2 as a result, acknowledging that in the highest-scoring route options ES3 and ES3a up to only 155m of safeguarded land is affected (please see our response to MIQ 10.8. and 10.10).
3. Topic Paper 2: on Gatwick Airport states in para 3.61 on Crawley Western Multi-Modal Transport *"Policy ST4, identifies an Area of Search for a Crawley Western Multi-Modal Transport Link, which is considered necessary because a number of key junctions in Crawley are already congested and alternatives are needed to prevent increased congestion, remove through traffic from the neighbourhoods, reduce inappropriate traffic using rural routes to Gatwick Airport and reduce pressure on the M23 Junctions 10 and 11. It will also help mitigate the surface access impacts of growth at the Airport, and will provide an alternative route to help address impacts from permitted new developments at Kilnwood Vale, Pease Pottage and North Horsham and from potential future development on the western side of Crawley"*.
4. Policy ST4 arises as a result of many junctions being at capacity or requiring mitigation for new development within the Borough, this also considers development coming forward in adjacent local planning authority areas. Paragraph 3.6.2 of the "Crawley Transport Study" (ES/ST/01a) includes sensitivity testing to specifically consider the changed highway demands arising from strategic development West of Crawley, within Horsham District, being promoted by Homes England.
5. In regard to soundness of the evidence base supporting ST4, an initial scoping study (ES/ST/02a - SYSTRA) undertaken on behalf of the council, including liaison with GAL and West Sussex County Council, which addresses the overlaps between the proposed Area of Search and the safeguarded area for much of the length of the route.
6. The SYSTRA report states that only GAL raised concerns regarding options ES3 and ES3a, the highest-scoring of the options, suggesting that these should be sifted-out. However, these two options were retained for further analysis due to their substantial benefits over the alternative options.
7. The route options, including ES3 and ES3a, were considered under a multi-criteria analysis (MCA) to further assess the pros and cons of each option. The results of the MCA show that ES3a performs the best overall, with ES3 being the second-best.
8. Paragraph 17.27-17.30 of the submission Local Plan acknowledge that the area of search partially overlaps land for safeguarding. It also confirms that work between Gatwick, Crawley, and WSCC regarding the overlap and any potential CPO is ongoing.

9. Paragraph 17.28 of the submission Local Plan confirms that the route options identified in the SYSTRA study are indicative only, however, this is ambiguous, and a narrower area of search reflecting the “preferred option” or the highest-scoring route options should be identified both in the policy ST4 and on the proposals map.
10. The Jersey Farm masterplan and its new access road have been designed to facilitate the future provision of the CWMMTL such that the Jersey Farm access road could ultimately form and provide part of the CWMMTL, consistent with the required design specification from SYSTRA.
11. Policy ST4 does not clarify the relationship between airport safeguarding and the wider area of search, or adequately explain or justify the inconsistencies with GAT 2 and is therefore unsound.
12. In order to provide clarity over any futureproofing for the access road within the Jersey Farm site, land will be safeguarded within the site to allow the CWMMTL to connect to the access road from the west, and to allow the access road to be widened to accommodate bus lanes and pedestrian/cycleways to be consistent with the anticipated design of the CWMMTL.
13. It is therefore necessary for soundness for Policy ST4 to require the alignment of a multi-modal link west of Crawley to have regard to land safeguarded at Gatwick Airport – if the principle of safeguarding is retained (see above). In terms of extent, the policy needs to better and more precisely specify the area of search, or the route alignment, and do so consistently with the removal, or amendment, of any airport safeguarding area (see Ardmore’s representations on GAT 2).