

## **Horsham District Cycle Forum**

Response to Outline Planning Application DC/16/1677 North Horsham.

Horsham District Cycle Forum (HDCF) are residents of people who live or work in the Horsham area and our objective is to make cycling a safe, convenient and attractive transport option for people of all ages and abilities.

### **1. Executive Summary**

Horsham District Cycle Forum considers that information concerning cycling is lacking in the documents, these documents are often ambiguous and contradictory. Overall there is absence of detail that is necessary in this application. There is also a worrying absence of commitments with too many promises or possibilities to allow this application to proceed without an enormous list of conditions.

The absence of CIL contribution means that to avoid any attempts to reduce provision in future, full details and timescales must be defined now, details must be agreed now by all interested parties and they must be future proofed. The core infrastructure must be full and complete first time as there will be no further opportunity to amend the design or details. If it is not viable to deliver the complete package now, then it questions the overall viability of the development.

#### Key issues

- Severance from Horsham by the A264 for cyclists and pedestrians remains a critical problem and is the single most urgent issue; to be resolved; underpasses are required.
- There is a lack of cycle routes between Horsham and the new development.
- Within the development the proposed cycle network is both incomplete and of inadequate quality.
- Proposals for cycle parking within the development need to be improved because they encourage car use over cycle use by making it easier to use and park cars than to get out and park bikes.

Overall there are many words in the application but the avoidance of commitments reveals a lack of ambition. There is no transport consideration of the cycle network and needs of potential cyclists or the imagination to provide a fully cycle-friendly development with a network of routes and paths. North Horsham is excellent cycling country which needs to be nurtured and encouraged with an ambitious and funded plan for a new generation of Horsham residents

## **2. Context of Cycling Concerns**

It is vital to obtain firm commitments to design and deliver all the core infrastructure for this development at this outline application stage, because this site will become a key expansion neighbourhood that will affect the success of the town for decades to come. Realistically, the development is likely to expand further beyond this application, so the core infrastructure takes on greater significance.

Once the road designs are in place it will almost impossible to change them, to add to them, or improve them later. Because there is no CIL, It will be virtually impossible to fund even essential infrastructure changes or improvements after the S.106 agreement is signed.

So when any changes or improvements are needed, such as public calls for increased cycle provision and infrastructure, there will be arguments that there is no funding source. Funding any changes will then be used as arguments to offset changes through reduced provision or facilities in the overall development.

The infrastructure needs to be robust and flexible enough to allow for future change and expansion. The infrastructure needs to be future-proofed at this stage.

The developer is already claiming that the development would be unviable with any CIL requirements. We expect that HDC will ensure that the viability calculations are fully opened to public scrutiny.

Cycling infrastructure is a key part of the infrastructure because:

- It is important legally: NPPF National Planning Policy Framework March 2012 has requirements to prioritise cycling
  - Core planning principles*
  - 17... actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;*
  - So in order to achieve a level of sustainability including sustainable transport, it will be essential to minimise the severance from Horsham by the A264 that was acknowledged by the Planning Inspector.
  - NPPF continues:
    - 4 Promoting sustainable transport*
    - 32. All developments that generate significant amounts of movement should...*
      - *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
      - *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;*
- West Sussex Sustainability Community Strategy 2008 – 2026 calls for cycling investment:
  - P9 Travel, transport and behavioural change -*
  - ....attractive alternatives to travelling by private car must be provided*
  - Greater consideration must be given to non-car road-users when planning transport networks and greater priority needs to be given to enhancing safety and accessibility for cyclists and pedestrians.*

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- West Sussex Transport Plan 2011 – 2026 Feb 2011 calls for cycling investment  
*Our Strategies for Transport in West Sussex p vi*  
*4. Improving safety, security & health*  
*...to encourage and enable physically active travel such as walking and cycling through behaviour change initiatives and provision of information and education*  
*...invest in new infrastructure which improves the County and creates safer conditions for all, and particularly vulnerable road users*  
*1.2.2 Tackling Climate Change p10*  
*P10/11.... maintain roads, footways, cycleways and drainage systems to a good standard ...*  
*...invest in new cycling infrastructure particularly in our major towns but also on some multi-use, inter-urban and leisure routes*

- West Sussex County Council Guidance for Car Parking in New Residential Developments September 2010 included requirement for cycle parking,  
*Type Size Cycle Provision (per unit)*  
*Houses Up to 4 rooms (1 & 2 bed) 1 space*  
*Houses 5+ rooms (3+ bed) 2 spaces*  
*Flats Up to 3 rooms (1 & 2 bed) 0.5 space (if communal storage otherwise same as 1 & 2 bed house)*  
*Flats 4+ rooms (3+ bed) 1 space*

Horsham District Cycle Forum notes that the applicant commits to meeting the WSCC minimum standards; however, these are a very poor minimum and are not in themselves sufficient to meet the requirements of NPPF and the other policy documents. If the development only delivers the WSCC minimum then residents (and visitors) will need to park and access their bikes at the back of garages and in sheds in the garden. This will make it more convenient to use a car than to use a cycle; cycle parking should be at least as convenient as car parking

The target should be indoor, ground floor cycle/pram space for each dwelling. The Forum recommends London Cycle Design Standards 2 and Cambridge cycle parking guide. The development needs cycle parking at the front of dwellings, parking space for adapted bikes, on-road cycle parking facilities and step-free internal storage for flats

We have been verbally assured by the developer in the masterplan meetings that North Horsham will be as the Liberty development at Kings Hill, yet homes here have no space to lean, let alone park a bike at the front of houses.

- New WSCC Walking and Cycling strategy, (fuller notes in text body)  
*In 3.2 (p15). Infrastructure Design Principles:*  
*“Cycling and walking is recognised as a key part of the transport mix. All new (development) and improvement / maintenance schemes will consider, and wherever possible prioritise, the needs of cyclists and walkers”*

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- Horsham District Planning Framework

*Strategic Policy.*

*Policy 5 4. Promotes high quality transport infrastructure which enables excellent pedestrian, cycling, bus and rail and vehicle accessibility for residents, visitors and business employees;*

*Policy SD9 Transport Infrastructure*

*The following transport infrastructure shall be delivered in conjunction with the development and the appropriate phase: Pedestrian and Cycle*

- 1. New and where the opportunity arises, safer pedestrian and cycle crossing points of the A264 to provide connections from existing residential areas to potential facilities and to give access to the development to / from Horsham and provide the existing communities in North Horsham access to the site and the Public Rights of Way network and the countryside to the north;*
- 2. A safe crossing for cyclists completing the Horsham to Crawley cycle route.*

*Policy 40 Sustainable Transport*

*There is commitment to developing an integrated community connected by a sustainable transport system. .... Development will be supported if it: ...*

- 2. Maintains and improves the existing transport system (road, rail, cycle).*
- 3. Is integrated with the wider network of routes, including public rights of way and cycle paths....*
- 5. Is located in areas where there are, or will be a choice in the modes of transport available and minimises conflicts between traffic, cyclists and pedestrians.*

*Policy 35 Strategic Policy:*

*Climate Change Development will be supported where it makes a clear contribution...*

*Measures which should be used to mitigate the effects of climate change include...*

- 4. The use of patterns of development which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport and other forms of sustainable*

*Policy 37 Sustainable Construction*

*Proposals must seek to improve the sustainability of development. To deliver sustainable design, development should incorporate the following measures ...*

- 5. Be designed to encourage walking, cycling, cycle storage and accessibility to sustainable forms of transport; ...*

- Current Design Manual for Roads and Bridges (DMRB) and the forthcoming Interim Advice Note (IAN) as mentioned later regarding the preferred status of grade-separated crossings
- Local Horsham health professionals' letter to promote cycling.
- West Sussex County Council has acknowledged that it is, in national terms, a 'poor performer' on road safety improvements There is a particular problem with cycle injuries: deaths and serious injuries have doubled since 2010 and now account for approaching 1 in 5 of all collisions with an estimated annual cost of £33m in 2014 alone. The new WSCC Road Safety Framework adopts Vision Zero with an interim target of reducing Killed and Seriously Injured on roads (KSI) by 25%. This application does not address the specific measures required to achieve this improvement in

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cycle road safety. The latest 5 year period statistic for West Sussex show there have been 14 KSI and 36 of all severity, with a slight increase in Horsham.

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### **3. Horsham District Cycle Forum is particularly concerned over**

- Missing infrastructure, e.g. crossings of the A264 and links into Horsham. This is a most critical issue, since no serious consideration given to underpasses.
- Inadequate quality of cycle routes e.g. poor footbridge instead of underpasses and shared-use paths instead of segregated.
- Inadequate networks of cycle routes across the development with no commitment to permeability of development land parcels
- Lack of cycle friendly junctions and reliance on roads as main cycle routes, not off-road.
- Lack of an off-carriageway lane on A264 despite the fast roundabouts.
- Missing commitments to off-site work and mitigations, such as missing link path along the northern side of the railway to Wimland Road and for access to Horsham.
- Residential cycle parking that meets only low quality standards.
- Inconsistencies between the parameter plans, particularly between the Masterplan and the Movement and Access plan, raise doubts as to what is being offered. There is a need for greater clarity over the detail that is in the outline application.
- Timings of delivery because cycle routes needs to be completed before, not after housing, needs to be clarified and be guaranteed.
- Missing link to Crawley including associated route improvements to complete the Horsham-Crawley cycle route). Already an important route, but the development of north of Horsham increases the need for this.

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### 4. Masterplan Surgeries and Responses

Horsham District Cycle Forum (HDCF) are named in the Design and Access statement as taking part in one of the masterplan surgeries, p22, yet many of our concerns and difficulties still remain with this application. There has been little improvement since HDCF raised the issues so it appears that HDCF's views have not been taken on board to achieve the reasonable commitments to building safe, accessible and high quality facilities across the development and for access routes across the A264

### 5. West Sussex Strategy for Walking and Cycling

The application needs to take into account the current and newly adopted West Sussex Strategy for Walking and Cycling which exists "to provide guidance in support of prioritising cycling and walking infrastructure in new development" (p2)

There is insufficient in the Site Wide Framework Travel Plan to support the approach. There needs to be Cycling Transport analysis to provide details and understand the cycling. There is nothing in the current documentation that focuses on cycling, or that shows any interest in describing, or delivering, let alone prioritising cyclists. 4.1.1 lists items that "could be included" but no commitments. This must be rectified with firm designs and commitments as part of this infrastructure outline planning application.

The stated objectives of this West Sussex Strategy for Walking and Cycling are:

*"1 To ensure that cycling and walking are recognised as important travel modes and therefore part of the transport mix*

*2 To make cycling and walking the natural choice for shorter journeys (such as journeys to school), or as part of a longer journey*

*3 To reduce the number of people cycling and walking killed or seriously injured on our roads*

*4 To support economic development*

*5 To reduce congestion by encouraging and enabling people to travel without a car" (p4)*

*In 3.2 (p15). Infrastructure Design Principles:*

*"Cycling and walking is recognised as a key part of the transport mix. All new (development) and improvement / maintenance schemes will consider, and wherever possible prioritise, the needs of cyclists and walkers"*

*Routes and facilities in built up areas which are designed primarily to (p16):*

*Re-allocate road space and improve safety at junctions on key distributor roads and public transport hubs*

*Manage traffic speeds (where appropriate with 20mph limits), through traffic and safety at junctions in residential streets*

*Create safer links to encourage sustainable journeys in particular travel to and from schools, employment sites, leisure destinations and transport hubs*

*Give Cycle / Walking priority at junctions where appropriate (p18)*

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### 6. Cycling Promises

The Design and Access statement (p134) claims that Horsham already has an excellent cycle network. This is **not true**: the current West Sussex Local Transport Plan, LTP3 2011-2026, states on page 60:

*The current provision of pedestrian and cycling facilities throughout the District, and in particular within Horsham, are not sufficient to support and maintain sustainable travel. This is because much of the network is disjointed and suffers from inadequate signing, safe crossing points and poor surfacing.*

Horsham District Cycle Forum, users of the network, also regards the cycle network in Horsham as inadequate and share these concerns. Even now the network being is incrementally reduced, as is currently happening in Parsonage Road. The existing network in Horsham is a low baseline and the applicant's aspirations should be far in excess of this. It is a legal requirement through NPPF to prioritise cycling and an obligation for new developments under the West Sussex Strategy for Walking and Cycling.

The Forum is concerned that the 'promises' for cycling look rather uncommitted and some appear to be dependent on the railway station proceeding.

There are promising design guidelines which imply off-road cycle tracks alongside main roads but these are not reflected in the actual proposals for the roads and junctions. Having looked at the cycle provision in Kings Hill which Liberty told the Forum was indicative of their plans for North of Horsham, we are concerned that this site falls well short of current best practice. For example there is heavy reliance on traditional roundabouts with flared arms which have poor cycle safety records, cycle lanes that stop short of junctions, leaving cyclists unprotected at the most dangerous points to slow or dismount and use the pavement.

The application is outline only. This means that apart from the "access to the A264, Rusper Road, Old Holbrook and Langhurstwood Road" as described on the parameter plans, everything else could change or be omitted entirely. The statements for cycling infrastructure need to be clear and unambiguous, with commitments that are conditions to the outline planning permission so they cannot be dropped or reduced at a later date.

On a wider scale, the applicant is already claiming that more s.106 money will make the development unviable and has reduced the amount of affordable housing that they stated to the planning inspector they would definitely provide. There are no commitments; indeed there is the likelihood that to get any improved cycle infrastructure this will be presented as coercion requiring a direct cut to funding other social needs.

### 7. Timescales

Timings on infrastructure delivery are very important. These cycleways need to be built in advance of the housing so that new residents can cycle from day one, not several years down the line when the connecting paths are built. Not all the cycleways are actually 'promised' -some are dependent on the railway station going ahead, many details are part of future planning applications and some routes are rather ambiguously marked as footpaths.

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It is particularly important that the “Missing Link to Crawley” delivered much sooner than is otherwise likely to happen. The Forum want commitments for the cycle links to be delivered ahead of the housing.

The applicant, Liberty, does say in its application that it is its ambition to deliver the infrastructure early, so there is no reason not to achieve early completion as a condition.

### 8. Cycling Links to Horsham

The documents make the outrageous claim that North Horsham will be a settlement that “fits seamlessly with Horsham”.

The Inspector specifically said that there would be severance, directly refuting this claim. In his Report on the Examination into the HDPF he stated that “*..there would clearly be some sense of separation from the existing urban area of Horsham, safe crossings for pedestrians and cyclists across the A264 could be provided at grade or by bridge; an existing underpass would be retained. Other traffic management ..[is needed].. to provide better pedestrian and cycle access to Horsham town centre.*”

There is a major dual carriageway (A264) dividing Horsham from North of Horsham which was specifically designed to be a northern limit to developments.

The current proposals have not mitigated, removed or resolved the A264 as a barrier to access.

### 9. Lack of Proper Crossings for the A264 Remains a Major Issue

These needs to safe, convenient, and compliant with Highways England Interim Advice Notices

To improve cycling access there need to be at least two underpasses beneath the A264 for easy flow of cyclists and pedestrians, in addition to the crossings. The Forum have the following document explaining why underpasses are preferred: <http://www.hdcf.org.uk/wp-content/uploads/2015/07/Why-underpasses.pdf>

Underpasses are supported by HDPF Policy 40 Sustainable Transport where there is a need to 6. ... *minimises conflicts between traffic, cyclists and pedestrians*<sup>22</sup>. Which is achieved by underpasses linking to the existing network and so ...*Minimises the distance people need to travel...*

Underpasses are used safely and successfully in Horsham (under the Dinnant Link road), North Street Subway, to the Horsham golf club and also the newly created tunnel under the M23 at Handcross. All are safe and not intimidating when properly designed and maintained. It is possible to install an underpass over a single weekend, see the A12 near Arnhem on <https://www.youtube.com/watch?v=btOE0rcKDC0>

Overall the development fails to resolve the severance problems created by the A264, solutions that should be a prerequisite for this development to proceed. Requests have been voiced directly to Liberty at masterplan and community group meetings yet there remain missed opportunities to provide cycle underpasses at different points along the dual carriageway. Instead it is proposed that there are to be signalised at-grade crossings which will slow traffic yet does not provide a satisfactory cycling alternative.

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These issues must be resolved, not compromised-out and lost. Cyclists need more crossings than cars, in order to use the network of path and routes adjacent to the road, not fewer crossing which are then restricted to main road intersections.

The Highways England Interim Advice Note, due out imminently, directly contradicts Liberty's assertion that at-grade crossings of the A264 are preferred and will be a material consideration when the issue of cycle crossings is considered

<http://www.aldercross.com/cms/uploads/SoRSA/John%20Parkin.pdf>

The bridge described in the documents as a PROPOSED FOOTBRIDGE & FOOTWAY IMPROVEMENTS, links at both ends to footways only, so it is clearly a footbridge only. The width is not scaled but unlikely to be the 4m needed for pedestrian and cyclist shared use. The section indicates a 3m only footway width with unmade surface which is inadequate in material and width for cyclist and pedestrians. The 10m cyclist visibility splays are shown entirely on the road, implying that cyclists are expected on-carriageway, not off-carriage way.

### 10. Cycling Specifics

- Needs comprehensive network of cycle and pedestrian routes both North-South and East-West. Currently the Illustrative Masterplan indicates numerous routes along both axis, however the definitive Movement and Access plan shows only a very few routes, mainly east-west and an inadequate network of non-vehicular traffic. The Movement and Access plan needs to be changed to illustrative to ensure that the Masterplan layout become the definitive plan.
- As a result of this Masterplan and the Movement and Access plan confusion there are conflicts and a lack of clarity on what is for cycling and what is for pedestrians only.
- Need pedestrian and cycle routes around the outskirts of the site, to encourage exercise and also to reinforce the boundary lines.
- Need commitments to full permeability of each development land parcels into the network of pedestrian and cycle routes
- Need commitments to dedicated cycle tracks on primary routes - these should be part of the infrastructure and part of this application.
- Need cycle lanes on secondary roads these should also be part of the infrastructure and part of this application
- Need commitments to build cycle friendly junctions
- Need confirmation of construction of the route under the bypass bridge adjacent to the railway line (the Missing Link).
- Cycle Parking and cycle storage need to be defined and form commitments for detailed applications to deliver. Cycle storage and parking needs to be in excess of WSCC standards that are outdated and woefully low.
- Need commitments to cycle route material, and design standards confirmation.
- The off-road paths appear to be standard shared-use. HDCF want to see kerb-separated routes with tarmac for cycling (like the Coton path or Dutch provision) instead of the usual UK provision (discontinuous paths, weak foundations, sharp bends, inadequate verges, gravel in many places, barriers). The applicant must give commitments on standards and finishes that meet the cycling requirements.
- The issue concerning waste lorries mixing with cycles on residential roads remains unresolved.

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- Need confirmation that there are no plans to close the Wimland Road level crossing and that should any proposal arise, then it will be strongly opposed by the developer and Horsham District Council. Closure would present serious problem for cycling between the western side of Horsham and Rusper.
- The plans for the Missing Link look acceptable but there must be a commitment and include conditions to ensure delivery of the list which are currently described as: “could include” – cutting back vegetation, lighting and surfacing”
- Delivery timescale needs to be a commitment, since even though it is on the parameter plan, it could possibly be withdrawn if the station does not happen.

### **11. Missing Link between Horsham and Crawley**

There needs to be confirmation of the construction of the Missing Link to Crawley including associated route improvements to complete the Horsham-Crawley cycle route. This is already an important route, but the development of North of Horsham increases the need for this. This needs to be delivered early, before residents start moving in, before the railway station and regardless of whether the railway station goes ahead. The link to Wimland Road should follow the direct route alongside the railway line. This is most direct, level and convenient for cycling, it allows the rest of the field to continue to be used for agriculture until it is needed by the developers. It also ensures that there is a route continuously available which is safely out of the way of the building work.

There is a flooding risk to this route under the A264 adjacent to the railway line which the developer needs to address the issue and provide drainage or pumping as necessary. We note the commitment to 3m wide, lit and sealed path.

### **12. Rat-running and Shortcuts**

There does not appear to be any more action proposed to stop rat-running in the lanes to the north which is of such concern to Rusper residents and will also affect cyclists. They are only promising to ‘monitor’ with traffic calming if necessary. This issue needs to be clearly and addressed with commitments as to how to prevent rat running and with it KSIs.

The “emergency access” onto Wimland Rd must be bike and tricycle friendly to allow cycle access, but not cars for shortcuts –reflective bollards with 1.5m clear gap between them are effective.

The earlier plan was for 300+ waste lorries per day to go through the western housing estate and this proposal still appears to be in place. This is not an acceptable route.

### **13. Wimland Road Level Crossing**

We are concerned that the level crossing in Wimlands Road may be closed to vehicles as a result of the construction of the railway station. This is especially important for people cycling (or walking) to and from the eastern part of Roffey or cycling around the east side of Horsham. We would seek assurances that if this occurred for any reason then the crossing will remain open for cyclists and pedestrians. to cross safely at this point. A push button arrangement similar to the one at Warnham station would be one option to achieve this.

**14. Pressure for Cycling Provision through Development Demographics**

The initial demographic of the developments is likely to be young couples, or with young families. It is essential that safe off-carriageway and segregated cycle routes are provided for their use. This in turn will create the right conditions to improve the experience, independence and ability to cycle to school or college, to routes North and West and critically into Horsham across the A264. This ability to learn to cycle in a safe public environment is a major factor in reducing accidents and KSIs. The route to Crawley also needs to be completed, funded by this development so cyclists can travel there safely.

There is a complete absence of estimates of demographics in the application, a worrying omission for such a major development. The only reference appears to be in the Design and Access statement, which confirms the needs for future provision now, in the paragraph: Adaptability and Robustness - Design for Change: a place that responds easily to future changes in use, life style and demography (p34).

Without separate safe cycle routes a whole generation will be disadvantaged. It is critical that extensive cycle infrastructure is funded and created within this application

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