



Tandridge District Council Regulation 18: Spatial Development Strategy Consultation

Thank you for the opportunity to comment on the Regulation 18 consultation of the Tandridge District Local Plan 2024-2044 ('the Plan').

Cumulative Impact Across the A264 Corridor

The proposed allocations on the Burstow and Copthorne boundary cannot be assessed in isolation. Any assessment of transport, infrastructure and environmental impacts must consider the cumulative impact of planned growth across the wider A264 corridor, including allocations and promoted sites within Tandridge District and neighbouring Mid Sussex District.

These include sites at:

- *Copthorne Bank (approximately 800 dwellings)
- *Oaks Farm (approximately 100 dwellings)
- *Existing promoted site south of Copthorne (approximately 235 dwellings)
- *West Park Road (approximately 84 dwellings)
- *Land opposite Haskins (approximately 100 dwellings)
- *Land opposite Dove's Barn (approximately 150 dwellings)
- *Crawley Down Road (approximately 45 dwellings)
- *Felbridge Showground (approximately 230 dwellings)

In addition, the Mid Sussex District Plan Main Modifications now include:

- *Crabbet Park, Copthorne (approximately 1,950 dwellings)
- *Land west of Turners Hill Road, Crawley Down (approximately 393 dwellings)
- *Land rear of The Martins, Crawley Down (approximately 150 dwellings)
- *Courthouse Farm, Copthorne Common Road (approximately 86 dwellings)

Taken together, these sites amount to well in excess of 4,000 dwellings across the wider Copthorne, Crawley Down, Felbridge and Burstow corridor. This represents a substantially greater level of development than has previously been considered through existing transport evidence and reinforces the need for a comprehensive cumulative assessment of impacts on the A264 corridor, the Star Junction, Dukes Head junction, local road network, healthcare provision, education infrastructure and other community services.

Traffic Impacts and the A264 Corridor

The A264 already experiences significant congestion, particularly around:

Copthorne

Crawley Down

Felbridge

The Dukes Head junction

The Star Junction

London Road approaches

Connections to Crawley and Gatwick Airport

The cumulative impact of more than 1,700 new dwellings, together with the proposed Crabtree Park development, would add substantial traffic to a network that is already under considerable pressure.

Particular concern should be given to the findings of the Surrey County Council and West Sussex County Council A22/A264 Corridor Study. Despite extensive investigation, the study failed to identify reasonable highway interventions capable of significantly resolving congestion issues at the Star Junction and along London Road.

If substantial additional housing growth is now proposed, the evidence base underpinning the Local Plan must be revisited. Any transport modelling undertaken previously may no longer be robust if it does not account for these additional development scenarios.

The Council should therefore demonstrate:

That cumulative transport modelling includes all relevant Tandridge and Mid Sussex allocations.

That the modelling includes the latest housing numbers proposed across the corridor.

That any mitigation measures remain effective when accounting for all planned growth.

That the Local Plan remains sound when tested against realistic traffic generation assumptions.

Failure to undertake such work risks underestimating future congestion and undermining the soundness of the Plan.

Sustainable Transport and Active Travel

Given the location of many of the proposed sites, there is a significant risk that future residents will be highly dependent on private cars.

The Local Plan should place greater emphasis on delivering genuine active travel and sustainable transport links between new developments and the area's principal employment centres, particularly:

Crawley

Gatwick Airport

Manor Royal Business District

New development should not proceed without a clear strategy for:

Continuous cycle routes

Safe walking routes

Improved bus services

Direct sustainable travel connections to employment areas

Without such infrastructure, claims of sustainable development are unlikely to be realised in practice.

The Council should also support strategic transport improvements within the wider Gatwick area, including consideration of an eastbound arm at Junction 9 of the M23 Gatwick interchange. Such infrastructure could help reduce pressure on local roads during periods of congestion, incidents and disruption on the strategic road network.

Gatwick Expansion, Flight Paths and Long-Term Uncertainty

In addition to existing aircraft noise impacts, the Local Plan must consider the implications of both current and potential future airport expansion.

While the approved Northern Runway project is expected to increase capacity and aircraft movements over coming decades, there is also a longstanding safeguarding area to the south of Gatwick Airport which has historically been protected for the possibility of a full-scale southern runway.

Should a southern runway ever be progressed, aircraft departing from that runway could potentially pass directly over parts of Copthorne and the proposed housing sites on the Burstow/Copthorne boundary.

The Council must therefore consider not only current flight paths but also longer-term aviation safeguarding constraints and future aviation growth scenarios over the lifetime of the Local Plan.

There is a fundamental question as to whether it is appropriate to allocate substantial new residential development in locations that may be increasingly affected by aircraft operations during the Plan period and beyond.

It should also be recognised that if land safeguarded for future airport expansion were ever released, alternative opportunities for housing delivery could become available closer to existing services, employment and transport infrastructure within Crawley, potentially reducing pressure for development in surrounding villages.

Accordingly, the Council should demonstrate that proposed allocations remain suitable under both existing and potential future aviation scenarios and assess the cumulative impacts of aircraft noise, traffic growth and airport expansion on residential amenity.

Strategic Sites Versus Village Expansion

While concerns remain regarding the scale of proposed growth, there is an important distinction between large strategic developments and smaller dispersed sites around existing villages.

Strategic sites such as Crabbet Park have the potential to deliver:

New schools

Healthcare facilities

Community services

Public transport improvements

Open space and recreation facilities

Supporting infrastructure as part of a comprehensive masterplan

By contrast, piecemeal development around villages such as Burstow, Copthorne and Crawley Down risks placing additional pressure on existing services and facilities that are already heavily utilised.

The Local Plan should therefore carefully consider whether growth is better directed towards comprehensively planned strategic sites capable of delivering their own supporting infrastructure, rather than relying upon existing village services to absorb significant additional demand.

Lessons from the Heathy Wood Development

A particularly important consideration is the precedent established through the Heathy Wood development in Copthorne

Heathy Wood was promoted as a significant residential-led development, with the wider scheme planned to deliver substantial housing alongside community infrastructure. Sources associated with the development indicate that the wider allocation was intended to provide around 500 homes together with supporting facilities.

It is understood that concerns regarding traffic impacts on Shipley Bridge Road resulted in restrictions being introduced, including a bus gate arrangement, rather than allowing unrestricted vehicular access.

This raises a fundamental question for the Local Plan:

If unrestricted access onto Shipley Bridge Road was not considered acceptable or viable for the Heathy Wood development, how can it now be considered acceptable for developments that could collectively generate traffic associated with up to 1,000 additional dwellings?

The Council must clearly demonstrate what has changed since the assessment of Heathy Wood to justify such a significant increase in traffic loading on the same road network

Without compelling evidence, the proposal appears inconsistent with previous planning decisions and transport assessments.

Conclusion

In conclusion, while the need for new housing is recognised, the proposed scale of development on the Burstow, Copthorne, Crawley Down and Felbridge corridor raises serious concerns regarding its cumulative impact on transport infrastructure, community services, healthcare provision, education, environmental quality and residential amenity.

A more strategic approach, focused on locations capable of delivering their own supporting infrastructure and services, would provide a more sustainable solution than piecemeal expansion around existing villages which are already facing increasing pressure on local facilities and transport networks.