

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Jason Hawkes
FROM:	WSCC – Highways Authority
DATE:	16 May 2025
LOCATION:	Former Novartis Site Parsonage Road Horsham West Sussex RH12 5AA
SUBJECT:	DC/25/0629 Residential development comprising approximately 206 dwellings, including the conversion of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.
DATE OF SITE VISIT:	As part of previous application
RECOMMENDATION:	Advice

1. Comments are made in respects of,

- Transport Assessment, document number 183.0009/TA/2, dated 13th March 2025
- Travel Plan, document number 183.0009/TP/2, dated 13th March 2025
- Site Plan – Overall – Lovell Site, drawing number HOR-ACG-XX-XX-DR-A-1060

2. At the outset, WSCC Highways acknowledge the separate planning application (DC/25/0415) for 244 dwellings submitted for the eastern part of this development site. Whilst this and DC/25/0415 are separate, there is need to view these applications cumulatively for certain impacts (i.e. capacity, accessibility improvements, and overall master planning). With regards to offsite improvement works, it will be necessary for the Applicants to identify all works jointly necessary and how these will be subsequently delivered. A note covering both schemes should be provided.

3. For the current application site, WSCC Highways recognise that there are Reserved Matters (RM) applications pending approval (DC/23/0171 and DC/23/0183) for Phase 1 and 2 of the approved outline consent (DC/18/2867) for the wider development of this site. It is understood that the current full application will replace the pending RM applications. For the purposes of reviewing the current application, the status of the RM applications is quite important inasmuch as whether these could be approved and therefore represent a deliverable fallback; the outstanding RM applications comprise a greater number of dwellings than now proposed, and therefore would result in a greater highway impact compared with the 206 dwellings for which permission is now sought. It would be helpful if the status of the RM applications (i.e. and whether these have a possibility of being approved) could be clarified in light of the above context.

4. In reviewing the Transport Assessment (TA) and the Travel Plan (TP), it's noted no reference seems to be given to the site adopting a 'vision-led' approach. Given 'vision-led' transport planning is specifically referenced in the National Planning Policy Framework, this is somewhat disappointing. Given also the edge of town centre location, the site would seemingly offer the high potential for challenging targets to be set to encourage significantly reduced car dependency, which in turn may assist in lessening the highway capacity impact identified.
5. Whilst WSCC Highways have reviewed the information submitted, the Applicant should provide a clear statement in terms of their position regarding 'vision-led' transport planning for this development. Ideally the Applicant should revise their approach to accommodate the 'vision-led' approach to transport planning. This may entail additional scenarios being tested within the TA.

Access

6. The site is to make use of an existing access onto Wimblehurst Road, which is subject to a 30mph speed limit. The use of this access was accepted as part of approved DC/18/2867 and has historically been used by now demolished uses on the site.
7. The existing access is quite significant in terms of width and kerb radii. The current application is seeking to amend the access with the northern kerb radius reduced to 6 metres with the southern radius remaining at 10 metres. The TA states that this results in the narrowing of the junction in the vicinity of the crossing to 9 metres.
8. The details submitted also indicate the provision of a 'Copenhagen' crossing. Such an arrangement is intended to give priority to pedestrians crossing with vehicles entering or exiting having to give way. Whilst WSCC Highway accept the principle of this arrangement, there are concerns with the details as presented.
9. Although WSCC do not have any formal guidance on the design of 'Copenhagen' crossings, that guidance that is available indicates a need to reduce vehicle approach and turning speeds, and that the crossing distance is kept to a minimum. The layout presented is at odds with this with there being a significant crossing distance and large kerb radii. The crossing should also be placed upon a raised table to further reduce vehicle speeds. It's unclear if this is the case.
10. The arrangement also includes a partial as opposed to full setback of the give way lines. This would result in those vehicles entering stopping partly on Wimblehurst Road whilst pedestrians cross. The use of a partial setback in this instance is not considered appropriate given the level of traffic using Wimblehurst Road.
11. A 'Copenhagen' crossing is also shown at the Wimblehurst Road/Richmond Road junction. Some of the concerns stated above for the site access junction would be applicable for this too. The design of both 'Copenhagen' crossings should be reviewed.
12. In reviewing the access design, WSCC Highways note a Stage One Road Safety Audit has been undertaken with the RSA team not identifying any safety concerns specifically with the 'Copenhagen' crossings. WSCC still considers there to be potential issues with the works presented. It also appears that the Wimblehurst Road/Richmond Road crossing wasn't reviewed as part of the Stage One RSA with these works not quoted. The RSA may need to be updated depending on the Applicant's actions regarding the crossing at this location.

13. Regarding the RSA, a Word version of the RSA Response should be provided directly to WSCC. WSCC can then enter information as the Overseeing Organisation and Agreed Actions. Once this is agreed, the RSA Response can be included on the planning file.
14. It's noted that the Applicant intends to reinstate the right turn lane into the site from Wimblehurst Road. This amounts to the remarking of the right turn lane rather than necessitating any physical highway works. There are no particular issues in this respects.
15. The Site Plan indicates a number of pedestrian accesses onto Parsonage Road. There are no particular issues with these given they join the existing footway. It's recognised that pedestrians and cyclists can also enter and exit the development via DC/25/0415. A means of preventing vehicular access (with the exception of emergency vehicles) between the two developments would need to be secured by condition.

Active Travel

16. The TA's submitted for the current application and for DC/25/0415 include similar assessments for walking, cycling, and passenger transport. The comments below are consequently taken from DC/25/0415.
17. The site is located within a highly accessible location with the town centre, employment uses, and passenger transport within reasonable walking and cycling distance. The location of the site offers significant potential to generate trips on foot and cycle.
18. The TA provides a relatively high-level assessment of walking routes in the general area with several junctions identified where tactile paving is missing. The Applicant is offering to fund the installation of tactile paving at these locations. Given the relatively low cost of these improvements, WSCC see no reason why these could not be undertaken by the Applicant.
19. With cycling, the assessment is also high-level. Point 3.21 of the TA makes reference to the gentle topography and wide carriageways within the local area making cycling attractive. There is though no mention of any consideration being given against LTN 1/20 or that the majority of carriageways in the local area are very well trafficked making on-carriageway cycling unfeasible for some users.
20. Again with cycling, the Horsham LCWIP identifies routes to the immediate east (Kings Road/North Street) and west (along Wimblehurst Road/North Heath Lane). In the circumstances, the provision of a route from the development site into one of these more strategic cycling corridors seems appropriate and would only benefit future residents; this could form an obligation on the development. It's noted that the location of these LCWIP schemes are mentioned in the Travel Plan but not the TA.
21. It is recommended that the Applicant looks again at walking and cycling routes from the site to key destinations to determine what improvements are required and could be provided from this development. WSCC acknowledge that any improvements sought will need to comply with the relevant planning tests.
22. WSCC also recognise that the proposed residential development will be liable for CIL. Any CIL monies collected could be put towards the development and implementation of LCWIP schemes.
23. With regards to local bus stop improvements, the previously secured contribution was to provide real time information. This appears to have been installed already.

As such, WSCC would not request specific funding towards nearby bus stops. This would not preclude the Applicant however assessing and improving walking routes to these bus stops.

24. The proposed car club space and vehicle is also noted. This should be secured as part of the s106 agreement. The obligation should cover an agreement over the location of the car club vehicle, the trigger for its provision, and the duration for which the Applicant will fund its provision.
25. The submitted Travel Plan (TP) reproduces various information already included in the TA. It's not proposed to repeat the comments made on this again here. With regards to specific paragraphs in the TP
- 5.5 – It's accepted that there will need to be a suitable number of dwellings occupied to establish a baseline. It would be helpful to understand estimated build out rates to know approximately at what point 50% occupations may be reached. Alternately, a time related trigger may be appropriate. Notwithstanding the trigger for the commencement of monitoring, it's understood that the TP will be implemented upon first occupation.
 - 5.8 – It's suggested that the trip rates from the TA are included in the TP against the target. This will then ensure all information is in one place.
 - 6.1 – The potential target referenced within this point (to single occupation vehicle journeys) doesn't necessarily reflect that within 5.8
 - (reduction of peak hour vehicle trips by 10%). The reduction of single occupation vehicle journeys could be added as a target if appropriate.
 - 6.4 – The welcome pack should include other measures (discounted travel for example) rather than just freely available information that residents may already have or be aware of.
 - 7.8 – WSCC are aware that resident questionnaires can result in poor response rates, and it's noted that these are being supplemented with our survey types. If response rates are stubbornly low, WSCC would have no particular issue for questionnaire to be abandoned with reliance instead on other surveys.
26. The submitted TP otherwise doesn't make any particular reference to the possibility for future remedial actions should targets not be met. The TP should include a commitment for remedial actions along with some indicative measures should targets not be met. This may then tie into a 'vision-led' approach if the Applicant determines to adopt this.

Highway Capacity

27. In reviewing the highway capacity impact, it is acknowledged that the site has historically accommodated trip generating uses and that the previously consented use would generate significantly more trips compared with the presently submitted residential schemes for this and the neighbouring parcel. There is also the potential fallback position that may result from the RM applications that remain pending. These points aside, the submitted TA assumes the site is vacant with all trips generated treated as new.
28. In summary,
- Trip generation has been calculated using the trip rates accepted for DC/18/2867.
 - Applying these trip rates, the site is expected to result in the following movements,

	AM Peak Period (0800-0900)		PM Peak Period (1700-1800)		Total (12 Hour)
	Arrivals	Departures	Arrivals	Departures	
Agreed Trip Rate for Private Flats	0.141	0.237	0.164	0.145	2.554
Trip Generation (159 Flats)	22	38	26	23	406
Agreed Trip Rate for Private Houses	0.339	0.471	0.471	0.322	5.891
Trip Generation (47 Dwellings)	16	22	22	15	277
Total Vehicle Trips (206 dwellings)	38	60	48	38	683

Table 7: Proposed Vehicle Trip Generation for Private Flats for 206 units (Agreed Trip Rates)

- It's acknowledged that these trip rates are based purely on private dwellings and do not factor in affordable housing units.
- Vehicle trips have been distributed across the network using Census 'Travel to Work' data for existing residents as a proxy for where future residents may travel to. It's accepted that this information applies only to work based trips.
- The impact of the development has been considered for a future year of 2031 by which time the site is anticipated to be complete and fully occupied. An appropriate traffic growth rate has been used to generate the future year base traffic flows.
- Different future year scenarios are included that account for situations without the development, with committed development (which is understood to include only the proposed development on the adjoining parcel (i.e. that submitted under DC/25/0415), and with committed and proposed (i.e. DC/25/0415 and DC/25/0629).
- Traffic impact on junctions within the study area have been undertaken using industry accepted modelling packages.
- For the purposes of committed development, DC/25/0415 is technically not committed. Nevertheless a scenario with this development would have been required.

29. Applying the above methodology, the following junctions have been assessed,

30. Wimblehurst Road Site Access – This junction is forecast to operate within capacity in all scenarios tested.

31. North Heath Lane/Parsonage Road/Wimblehurst Road mini-roundabout – The junction is forecast to operate within capacity for all PM modelled scenarios. During the AM peak, all scenarios indicate progressively worsening capacity issues (particularly on North Heath Lane but subsequently Parsonage Road in the future year). It's apparent that the proposed developments worsen the situation.

32. Looking at the modelling outputs, it's evident that the impacts occur within a 45 minute from 0800 to 0845. Ordinarily, this peak would coincide with the typical network peak of traffic as people travel to work or school. Drivers would be expecting high volumes of traffic at these times. It must also be noted that there are limitations within the modelling whereby this becomes unstable once theoretical capacity is exceeded. The modelling is therefore useful in demonstrating that there will

be capacity issues but the actual queues and delays should be viewed with a degree of caution.

33. The above aside, the impact on this junction does need to be considered against the National Planning Policy Framework. This states that development should only be refused where the development results in unacceptable safety or severe impacts. The increase on delay to drivers is acknowledged but this is not considered to meet the test of being severe given the pre-existing conditions and the short time window over which the issues would occur.
34. B2237 North Parade/Wimblehurst Road junction – Similar to the previous junction, the modelling is showing an existing issue that progressively worsens across the AM and PM peaks with the proposed development. In viewing the outputs, WSCC fully recognise the potential for increased queues and delays with the development. However the NPPF is quite clear in terms of the test that is to be applied (i.e. unacceptable safety or severe impacts). It's not considered that either of these tests would be met in this instance.
35. As previously identified, there is a potential upgrade that could be made to the software controlling the traffic signals (known as MOVA). This is a low cost upgrade (£6k) that could benefit the overall performance of this junction.
36. Parsonage Road/Parsonage Way/Foundry Lane mini-roundabout – This junction is forecast to operate within capacity in all scenarios.
37. Crawley Road Roundabout – The modelling indicates a capacity issue on the Redkirk Way arm in the AM peak. This is an existing issue that progressively worsens with the development. However the queues and delays at their worst are not considered to constitute a severe impact.
38. In reviewing the capacity impact, WSCC recognise that this development will generate additional traffic onto the local network, which in turn will worsen existing issues. The modelling is considered representative of a worst case given that no 'vision' based scenario with inherent increased share by sustainable modes (and therefore reduced vehicle trip generation) is included. It's also noted that the development worsens but is not the sole cause of capacity issues. As stated already, the NPPF sets a high bar whereby development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network, following mitigation, would be severe taking into account all reasonable future scenarios. WSCC do not consider that this development will result in severe or otherwise unacceptable impacts.

Site Layout

39. The application form indicates that the internal site roads, footways, and casual parking areas are not being offered for adoption as public highway. WSCC has reviewed the proposed layout and would comment as follows.
40. Although the TA indicates that carriageway widths will narrow to between 4.5 and 5.5 metres from initially being 6.8 metres, from scaling the proposed layout the widths appear to be more between 5.6 and 5.8 metres after being initially 6.8 metres. There's no particular concern with this potential inaccuracy between the TA and the layout plan.
41. The layout presents a mix of carriageways with segregated footways as well as shared surfaces (where all users share the same space). There are no obvious issues in terms of where these areas are used.

42. The layout also includes a number of quite long access roads with no turning heads. The issue is whether reversing distances would be overly long and therefore exceed standard requirements. The Local Planning Authority should seek the views of the waste collection authority.
43. There does need to be some consideration given to ensure continuous pedestrian walking routes between this and the adjoining development. As shown, some of the pedestrian routes from this site would land within car parking spaces or dropped kerbs.
44. The means of preventing vehicle access between this and the adjoining development will need to be secured by condition. Such measures will need to deter vehicle access but must still allow access for cyclists.
45. Car parking is indicated to comply with current WSCC Parking Guidance.

Summary

46. There are a number of matters that the Applicant should respond to prior to WSCC Highways making a formal recommendation.

Ian Gledhill
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