

## WEST SUSSEX COUNTY COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council FAO: Jason Hawkes
<b>FROM:</b>	WSCC – Highways Authority
<b>DATE:</b>	8 April 2025
<b>LOCATION:</b>	Land To The North and South of Mercer Road Warnham West Sussex
<b>SUBJECT:</b>	DC/25/0151 Redevelopment of the site to provide 304 residential units, parking, a retail unit, public car park, public open space, attenuation basins and landscaping
<b>RECOMMENDATION:</b>	More Information

1. In making these comments, WSCC Highways have reviewed,
  - Transport Assessment, dated December 2024
  - Residential Travel Plan, dated December 2024
  - Design and Access Statement, dated December 2024
2. WSCC Highways has undertaken an initial review of the information submitted. There are a number of matters that WSCC would request further information in respects of prior to a full formal response being provided.
3. It's noted that whilst the TA quotes those paragraphs within the NPPF that refer to 'vision-led' planning, the TA does not otherwise include or promote any transport vision for this development. A response would be sought from the Applicant as to why the approach within the NPPF has not been applied in this instance. In the event that the Applicant adopts a 'vision-led' approach, it will be appropriate for the TA to include further scenarios accounting for the 'vision' applied. These should be agreed with WSCC.
4. For both walking and cycling, the TA adopts a high level approach with limited consideration given to the suitability and nature of available routes towards key to day to day services (i.e. nearby schools, bus stops, etc.). The TA should identify key destinations and provide a detailed review of the walking/cycling route to these. As part of this, barriers and potential improvements should be identified.
5. As a matter of principle, there are very few existing services within reasonable walking distance of the site. WSCC acknowledge that walking distances may vary depending on the journey purpose. For this assessment, it is recommended that a maximum walking distance of 1 mile / 1.6km is applied. Based on the National Travel Survey, this is the distance within which 80% of walking trips are made. The means of measuring the walking distance should be clearly set out with

actual walking distances (rather than isochromes) from the centre of the site used.

6. Related to walking, the development includes a new length of footway along Langhurstwood Road. This is noted as including a narrow 1.5 metre wide length over 58 metres. The Applicant should clarify that the 1.5 metre width can be provided at all times with there being no hedgerows or such like that will further narrow this. WSCC are concerned for the use of a narrow footway along Langhurstwood Road given the potential for wing mirror strikes from passing HGVs. It's noted also that a length of the footway is within the root protection area of several trees. The Local Planning Authority may wish to seek specialist review of this to ensure it will not prevent the footway coming forward.
7. The walking route southwards from the development parcel north of Mercer Road to reach the new length of footway is somewhat convoluted compared to vehicle access to this parcel. The design should seek to achieve a direct walking route. The concern otherwise is that pedestrians will simply walk along Langhurstwood Road. In these respects, the layout of the northern parcel includes footways that lead directly onto Langhurstwood Road with there being no onward connections.
8. For cycling, no reference is made to the guidance within LTN 1/20 nor any consideration given to the suitability of routes to reach the various destinations identified. The provision of on-carriageway cycle route markings will not offer any betterment or safety enhancement to those using Langhurstwood Road, which is known to carry a substantial volume of HGV traffic.
9. The presence of the committed Land North of Horsham/Mowbray development is recognised. However there are no direct walking or cycling routes from the proposed development site towards the existing Bohunt School or any other services that may come forward as part of this until the western/Phase 3 development comes forward. Given the lack of suitable routes, limited weight is afforded to the presence of these existing facilities within Mowbray particularly in terms of walking and cycling at the current time.
10. For the future situation with Phase 3 Mowbray in place, there remains the concern as to how the proposed development will tie in with this. The submitted Design and Access Statement indicates potential access locations but provides no certainty or commitments. Through the current application there should be some certainty provided that the proposed development can tie in with the adjoining Phase 3 Mowbray.
11. There is also the concern as to whether a convenience store within the proposed development is viable or attractive given the number of units proposed. Again, the TA places a degree of weight on this and as such it would be beneficial to understand what discussions the Applicant may have had to provide some certainty that this may actually be realised.
12. The site is positioned close to Warnham railway station. The frequency of services isn't great but journey times towards Horsham are very short. The nearest bus stops are quite some distance away. The walking route to the

nearest bus stop also appears to be measured from the site access rather than a central point; actual walking distances potentially will be significantly greater. This should be clarified.

13. In summary, without any connections achieved into the adjoining and as yet unbuilt Phase 3 Mowbray, the site is considered to be poorly located to enable trips on foot, cycle, or by bus.
14. Regarding the highway works, a design audit would be required for the proposed interim A264/Langhurstwood Road traffic signal junction. This was identified by WSCC as part of pre application discussions.
15. It's recognised that the proposed interim junction design is reliant on a change of speed limit on the A264 (from 70mph to 50mph). The speed limit change will be subject to a separate statutory consultation process the outcome of which cannot be guaranteed. Should the speed limit process fail, the junction design as presented cannot be implemented. If the speed limit is reduced, WSCC will require a scheme of speed monitoring to be undertaken to ensure compliance with the 50mph limit. Further measures may then be required if the limit is not being abided by.
16. WSCC has previously (through pre application discussions) that the Applicant liaises with the Mowbray developer to determine the likely build programme for the A264 Western Roundabout. For the purposes of the current proposal, it would be beneficial to understand how the potential construction programmes for the interim signalised junction and full roundabout relate.
17. The Applicant should provide Word versions of the Road Safety Audit Responses to enable WSCC to complete the relevant Overseeing Organisation and Agreed Actions as required under GG 119 (the overarching standard for Road Safety Audits).
18. The Applicant is invited to provide details as to how the amendments identified to the approved A264 Western Roundabout forming part of DC/16/1677 (Land North of Horsham) will be secured. The proposed changes will require amendments to the approved plans forming part of the Land North of Horsham proposals. There needs to be some certainty as to how these additional works will be secured and then implemented.
19. WSCC note the additional parking for Warnham railway station. It's unclear who will adopt and operate the car park; WSCC will not adopt this. Given the proposed development roads are to be adopted as public highway, it would seem that these will offer a free alternative to using a chargeable car park. The Applicant should provide details as to how car parking associated with the station will be prevented throughout the proposed development.
20. The proposed assessment future year, especially that covering the interim scenario, is considered unrealistic. It is unreasonable to anticipate that a development of this size will be built and fully occupied within 4 years. A later assessment year would be required based on a realistic construction programme.

The future 2031 scenario is noted as including the full Land North of Horsham development. This in practice is unlikely to be realised by this time. Concerns were raised in terms of the suitability of the future years by WSCC as part of pre application advice issued in April 2024.

21. WSCC would request the full outputs from the Arcady, Picady, and LinSig modelling. This should include also the LinSig model.
22. There appears to be no detailed drawings showing the geometry and visibility splays for the proposed site accesses onto Langhurstwood Road. Drawings should be provided.
23. Two travel plans are proposed. That relating to the employment uses has not been reviewed given no employment uses are proposed (the convenience store excluded). The submitted residential travel plan is noted. The travel plan includes a relatively modest target. This perhaps reflects the limited ability to potentially achieve anything more substantial in this location. The travel plan otherwise includes a limited palette of measures primarily relating to the provision of information; There are no financial offerings, such as travel discounts or such like. The travel plan also lacks any remedial actions should targets not be met. The travel plan should be revised to make this more robust.
24. In the event that the Applicant applies a 'vision-led' approach, the travel plan should include scenarios that reflect this.
25. The Applicant should note that WSCC apply an auditing fee for travel plans. This will be secured as part of the s106 agreement.
26. In summary, WSCC Highways are concerned with a number of elements relating to this proposal, and how these in turn ensure the development complies with paragraphs 115 a, b, and d, 117 a, and 118. The Applicant is invited to present further information.

**Ian Gledhill**  
**West Sussex County Council – Planning Services**