

## Land to the North and South of Mercer Road, Warnham, West Sussex (Application Ref. DC/25/0151)

### Transport Technical Note on Behalf of Legal & General

#### 1.0 Introduction

1.1 This note has been prepared by Glanville Consultants on behalf of Legal & General (Strategic Land North Horsham) Limited following a review of proposals by Riverdale Developments for the redevelopment of land at Mercer Road, Warnham.

1.2 The proposals are the subject of a planning application submitted to Horsham District Council. The application reference is DC/25/0151, and the description of development is as follows:

*Redevelopment of the site to provide 304 residential units, parking, a retail unit, public car park, public open space, attenuation basins and landscaping*

1.3 The following documents have been reviewed:

- Transport Assessment, dated December 2024
- Residential Travel Plan, dated December 2024
- Design and Access Statement, dated December 2024

1.4 In reviewing the documents, several concerns have been raised with the proposals, which are described in detail in the sections below. The concerns relate to three main issues, as follows:

- the lack of a vision-led approach
- the site's poor sustainability / accessibility; and
- the effect of the proposed access arrangements on the Mowbray development.

1.5 As a result of these concerns, Legal & General objects to the proposals.

#### 2.0 A Vision-Led Approach

2.1 The latest National Planning Policy Framework (NPPF) requires a vision-led approach to transport, defined as an approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as 'predict and provide').

2.2 NPPF paragraph 109 stipulates that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.

2.3 NPPF paragraph 115 requires development to ensure that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.

2.4 None of the documents submitted with the planning application that have been reviewed explain how a vision-led approach to transport has been considered or demonstrate how such an approach will be applied effectively.

- 2.5 Therefore, the proposals do not comply with the requirements set out in the NPPF and the proposed transport solutions are not considered to be well-designed or sustainable. These concerns are further described below.

### **3.0 Sustainability / Accessibility**

- 3.1 Legal & General has previously objected to the draft allocation of this site due in part to its poor sustainability and accessibility.
- 3.2 The Public Right of Way (a footpath) which currently runs along Mercer Road itself will be diverted through the application site on the south side of Mercer Road, with pedestrian access points at each end of the site's Mercer Road boundary. A pedestrian/cycle access is proposed on Langhurst Wood Road at the southeastern corner of the application site.
- 3.3 The Mercer Road proposals include providing a new 2.0m wide footway along the western side of Langhurst Wood Road, extending between the proposed pedestrian/cycle access and a proposed signal-controlled junction with pedestrian crossing facilities over the A264. However, due to constraints on the width of the public highway along Langhurst Wood Road, there is a length of around 58m along which the proposed footway width reduces from 2.0m to only 1.5m.
- 3.4 The parameter plan for access and movement approved by virtue of the outline planning permission for the Mowbray scheme shows the primary road through Phase 3 in the western part of the development terminating at a new roundabout on Langhurst Wood Road, at the junction with Mercer Road, and the southern end of Langhurst Wood Road closed to through traffic at the A264 junction with traffic on Langhurst Wood Road diverted through the Mowbray development to access the A264 via a large signal controlled roundabout.
- 3.5 The primary road through Phase 3 will provide part of the bus route through the Mowbray development, with buses U-turning at the proposed Langhurst Wood Road / Mercer Road roundabout. The first bus service required for the Mowbray development (route 71) commenced in 2024, triggered by the occupation of the 100<sup>th</sup> unit in Phase 1. This service currently operates hourly through Phase 1, via Rusper Road and Bailey Road, serving Bohunt School, with buses turning at the existing eastern extent of Bailey Road. Eventually the bus service will be extended to the east into Phase 2, via Bailey Road, and eventually to the west into Phase 3, via Moat Road, crossing Old Holbrook and turning at Langhurst Wood Road. The service frequency will increase to half-hourly on the occupation of the 840<sup>th</sup> dwelling on the Mowbray development.
- 3.6 The primary road leading through Phase 3 of the Mowbray development will also provide pedestrian and cycle access from the Langhurst Wood Road / Mercer Road roundabout, in accordance with the approved cycle strategy.
- 3.7 There appears to be significant reliance placed by the applicant for the Mercer Road scheme upon Legal & General's Land North of Horsham/Mowbray development that is committed by virtue of outline planning consent having been granted and the facilities and amenities that the Mowbray development will provide, as well as the highway infrastructure that will provide access to these facilities and amenities and the associated improvement to local bus services.
- 3.8 However, other than the new Bohunt secondary school, none of the community facilities or local amenities that will ultimately be delivered by the Mowbray development have been constructed and brought into use.

- 3.9 The application site on Mercer Road is located to the west of Langhurst Wood Road that forms the extreme western boundary of the Mowbray development. The western part of the Mowbray development will come forward as Phase 3. Only development within Phase 1 of the Mowbray scheme is currently underway. Very little of the enabling infrastructure for Phase 2 has been constructed – only the left-in / left-out junction on the A264, located between the Ruser Road and Moorhead roundabouts has been built. The programme for the development of Phase 3 of Mowbray is unknown but construction is likely to be some years away.
- 3.10 As such, there is no certainty when the various facilities and amenities on Mowbray will be available and when the connections via Langhurst Wood Road and through Phase 3 will be constructed these are required to provide access to the Mowbray development from the west.
- 3.11 The Mercer Road site is located adjacent to Warnham railway station, but the service is poor with only hourly train services to Horsham and London Victoria.
- 3.12 Therefore, until Phase 3 of Mowbray is constructed, and in the absence of any proposed connections, the Mercer Road site must be considered poorly located to facilitate trips by active travel mode and by bus.
- 3.13 Whilst not perhaps directly related to transport, there is a question mark over the viability of the new convenience store proposed as part of the Mercer Road scheme if one is provided in Phase 1 of Mowbray development. Schedule 4 of the Section 106 agreement from the outline planning permission for Mowbray stipulates that at least one A1 retail unit with a minimum floorspace of 150sqm must be provided within the Local Centre to be provided within Phase 1 (it should be noted that outline planning permission was granted when the old use classes were still applicable). If a convenience store is not viable within the Mercer Road scheme, it will inevitably lead to residents having to travel off-site to meet all their shopping needs and, in the absence of a well-designed and sustainable transport solution, will likely lead to residents traveling by car to meet their needs.

## **4.0 Access Arrangements**

- 4.1 The Mercer Road application site will be served via four new access junctions, three on Mercer Road and one on Langhurst Wood Road.
- 4.2 It is proposed as part of the Mercer Road scheme that the existing A264 / Langhurst Wood Road left-in / left-out priority-controlled junction will be upgraded to a signal-controlled junction, allowing for all movements except the right-turn out of Langhurst Wood Road. The upgraded junction will incorporate signal-controlled pedestrian crossings over the A264.
- 4.3 This interim arrangement is proposed to be in place until the implementation of the Mowbray development's western access roundabout on the A264, which provides access to/from Phase 3 and includes the closure of the southern end of Langhurst Wood Road and the re-routing of Langhurst Wood Road through the Phase 3 of the Mowbray scheme as well as comprehensive pedestrian crossing facilities.
- 4.4 There are doubts as to the deliverability of the interim solution for the Mercer Road scheme that is reliant upon the proposed reduction in speed limit on the A264 from 70mph to 50mph. The change in speed limit will require a Traffic Regulation Order and be subject to a separate statutory consultation process, the outcome of which cannot be guaranteed. Without a reduction in speed limit, the interim design would not comply with the relevant design standards.

- 4.5 There are concerns about the relationship between the construction programmes for the Mercer Road development, the interim junction arrangement at the A264 / Langhurst Wood Road junction and the western access roundabout on the A264 that will serve Mowbray.
- 4.6 The construction of an interim junction solution will complicate the construction of the Mowbray access roundabout for Phase 3 and the associated traffic management, meaning the Mowbray access will take longer to construct. It may be necessary to remove the traffic signals at the interim junction and restrict traffic movements to/from Langhurst Wood Road whilst the Mowbray access is built, and this would very likely result in the removal of the controlled crossing facilities that would be the only safe way for residents of the Mercer Road scheme to cross the A264 high-speed dual carriageway.
- 4.7 Unless and until it can be robustly demonstrated that the interim access solution proposed for the Mercer Road scheme can be delivered, operated and subsequently removed without constraining the construction of the proposed access to Phase 3 of the Mowbray development from the A264, and whilst ensuring future residents of the Mercer Road development will always have a safe way to cross the A264, Legal & General has significant concerns regarding the impact and safety of the Mercer Road proposals.

## 5.0 Summary & Conclusion

- 5.1 This note has been prepared following Glanville's review of proposals by Riverdale Developments for the redevelopment of land at Mercer Road, Warnham (ref. DC/25/0151).
- 5.2 Several concerns have been identified, which relate to three main issues:
- the lack of a vision-led approach;
  - the site's poor sustainability / accessibility; and
  - the effect of the proposed access arrangements on the Mowbray development.
- 5.3 Therefore, Legal & General continues to object to the Mercer Road proposals.