

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Amanda Wilkes
FROM:	WSCC – Highway Authority
DATE:	10 July 2025
LOCATION:	Stonehouse Farm Handcross Road Horsham RH13 6NZ
SUBJECT:	DC/25/0403 Full Planning Application to form a comprehensive masterplan including: 1. Rationalisation and enhancement of existing commercial facilities (Use Classes E(g) B2 and B8 at Stonehouse Business Park including demolition of two buildings and their replacement with new Class E(g), B2 and B8 facilities. Extension of existing building to form a new office and wardens' accommodation. Existing mobile home removed. 2. Decommissioning of the Anaerobic Digester and re-use of the existing 2no buildings for storage and office uses (Class E (g) and B8) and the diversion of a public footpath. 3. Residential redevelopment of the Jacksons Farm site including the demolition of existing barns to provide 3no. dwellings with access, parking, and landscaping. More information received from Dominic Smith's email on 1st July 2025.
DATE OF SITE VISIT:	25 April 2025
RECOMMENDATION:	More Information Required

This is the second WSCC Highways response to the above planning application seeking full Planning Application to form a comprehensive masterplan including:

1. (Component part 1) - Rationalisation and enhancement of existing commercial facilities (Use Classes E(g)) B2 and B8 at Stonehouse Business Park including demolition of two buildings and their replacement with new Class E(g), B2 and B8 facilities. Extension of existing building to form a new office and wardens' accommodation. Existing mobile home removed.

2. (Component Part 2) - Decommissioning of the Anaerobic Digester and re-use of the existing 2-no buildings for storage and office uses (Class E (g) and B8) and the diversion of a public footpath.

3. (Component Part 3) - Residential redevelopment of the Jacksons Farm site including the demolition of existing barns to provide 3-no. dwellings with access, parking, and landscaping.

Comments below respond to further information produced by i-Transport transportation consultants (Document Reference. ITS19302-002, dated 23 June 2025) and should be read alongside previous WSCC Highways response dated 28 April 2025.

Response.

In its response dated 28 April 2025, the Highway Authority requested that additional information be sought from the applicant. The details of this is found in the main text of the previous WSCC Highways response in **bold** text but summarised below. Comments in **red** are latest provided by the applicant's transport consultant with latest WSCC Highways responses in **green** text:

For component part 1 of the development:

1. The TN states that it is proposed to increase the floor space of the office and one of the commercial units, with the agricultural unit being demolished, resulting in an overall net *decrease* in development on the site. However, the TN continues by saying that the proposals will result in a minor net **increase** of 59.30 sqm of development on site, which conflicts with the previous statement. Applicant to explain this, please.

The use of decrease was a typographical error – the assessment within the Transport Note has been prepared on the basis of an increase, including the trip impact assessment at Table 2.4.

Comment noted.

For component part 2 of the development:

1. A full Road Safety Decision Log (the Designer's response) is required by the Highway Authority to add its comments and agreed actions for the site. Applicant to provide in Microsoft WORD format, please, for editing purposes.

This has now been provided. Highway Authority comments will be made in a separate document that will be sent to both the applicant's transport consultants and, when complete, to the planning case officer.

2. With regard to the visibility splays offered, these are less than those recommended in DMRB for a road with a 50mph speed limit. Applicant to provide further explanation and justification about this, please, particularly given that trips to and from the site are shown to increase if this proposal is approved.

Handcross Road is subject to a 50mph speed limit – however, ATC data has been obtained that identifies mean and 85th percentile speeds. The data is provided at Appendix E and the speeds and resultant visibility splays using DMRB parameters are summarised in Table 3.1 (below):

Access	Design Speed		Visibility Splay	
	Eastbound	Westbound	Eastbound	Westbound
Proposed Driveway Access	44.2mph	46.2mph	121m	129m

Visibility splays at the access have been reviewed in this context. The updated access drawing ITS19302-GA-009 demonstrates the splay to a 1m offset from the nearside kerb line. The splays are achievable within land under control of the Applicant / within the highway boundary, with some maintenance of vegetation that has overgrown into the highway. This maintenance will be undertaken as part of the works required to implement the access improvements under license from WSCC. An extract of the drawing is provided in Image 3.1 (below):



Having reviewed this, the text above conflicts with what's shown on the plan. Although the plan shows a visibility splay of 2.4m x 121m in the leading traffic direction (looking west from the access) taken to a point 1.0m offset from the kerb line which is acceptable to the Highway Authority, the visibility splay of 2.4m x 129m in the trailing traffic direction (looking east from the access), is shown to the *centreline* of the road, which is generally not acceptable to the Highway Authority as it does not meet DMRB requirements. If the splay is taken to the centreline, the full extent of the play is not available meaning that vehicles travelling west-bounds that might be overtaking other vehicles travelling in the same direction, could be 'lost' in the area on the nearside of the carriageway and, therefore, not visible to vehicles emerging from the access, which could result in conflicts. And although there is a fixed white line on this part of Handcross Road that instructs drivers not to overtake, extending approximately 45m in the leading traffic direction and 125m in the trailing traffic direction from the proposed point of access, there is no physical measure in the carriageway to stop indiscriminate overtaking. Therefore, the applicant should re-visit this and provide visibility splays to an offset of 1.0m from the nearside kerb line in both directions.

3. The left turn out by an HGV does, as the TS states, over-sail the opposing traffic lane on exit. Applicant to provide comparison between existing site level of usage by HGVs and the proposed level of usage.

Please see applicant's response in points 4 and 5 of this response.

Overall, trips by cars and vans (non-HGV) are set to increase compared with the baseline situation should planning permission be granted. However, HGV trips are shown to marginally increase as Table 2.9 (taken from the Addendum Transport Note and replicated below) shows based on TRICS analysis. However, comments contained in the Road Safety Audit Decision Log says that the prospective occupier typically has infrequent HGV arrivals and departures, stating that this would be one per-week. Either-way, HGV trips could be very similar to the existing situation or less, if a specific business occupies the new buildings. Therefore, the occurrence of left-turning HGVs oversailing the centreline of Handcross Road, an item additionally referred to in the Road Safety Audit, would be very similar to the existing situation, or less, dependent on future occupier.

4. Evidence is required to show what the comparison with the existing use is HGV trip-wise, and who the proposed occupier of the site is proposed to be.

While the surveys undertaken at Stonehouse Farm Business Park provide local data, as set out in paragraph 2.3.6, the uses are split across multiple occupiers whereas the proposed change of use at Component 2 is provided for within a single building intended for use by a single occupier – subdivision of this space for use by multiple occupiers would require adaptations to the building necessitating a requirement for further planning permission being sought.

There is not a linear progression in the extent of the floor area and trips when occupied by a single employer versus multiple occupiers. For example, a single occupier enables:

- Staff efficiency – a larger floor space will likely be more staff efficient and requiring less staff to be in attendance. Multiple occupiers will duplicate roles which would be condensed into a single role for a larger occupier (e.g. site managers, cleaning staff, HR and administrative functions, banksmen etc).
- Servicing efficiency – deliveries and servicing can be consolidated into a single delivery as opposed to multiple smaller deliveries.
- Size of storage – larger buildings will enable the storage of larger components, taking up more of the space through the same number of movements.

To assess the extent to which this may influence trip rates, a TRICS assessment has been undertaken using the same site selection parameters. The outputs of the assessment and site selection parameters are provided at Appendix D.

The assessment calculates the trip generation of a business park occupied by multiple providers (any surveys less than 5 units have been deselected) as well as the trip generation associated with a single larger industrial unit of a scale similar to that sought as part of the proposed change of use of Component 2. The daily total vehicles and OGV trip rates on a 'per 100sqm' basis are summarised in Table 2.7, below:

Table 2.7: Multiple Unit vs Single Unit Trip Comparison

Trip Type	Multiple Occupiers Trip Rate Per 100sqm	Single Occupier Trip Rates Per 100sqm	%age Difference
Total Vehicles	4.50	3.55	-21.1%
OGVs	0.62	0.17	-72.6%

See comments above in point 3.

- Daily trips (for both the existing and proposed developments and for car and HGV traffic) is required for comparison purposes.

Provided in Table's 2.8 and 2.9 found in the Addendum Transport Note. See below:

Table 2.8: Traffic Forecasts

Assessment Method	Total Vehicle Movements	OGV Movements
Single Occupier TRICS Trip Rates	176	8
Locally Sourced Data with Single Occupier Reduction	175	8

Table 2.9: Net Impact

	Total Vehicle Movements	OGV Movements
Baseline	37	7
Forecast	176	8
Net Impact	+139	+1

- As there is a significant difference in terms of car trips compared to the existing use, and it is not known what additional HGV trips would be compared to the previous use and mindful of the visibility issue highlighted earlier as being below that recommended in DMRB, plus the oversailing of left-turning HGVs out of the access, the applicant is invited to explain why they consider that component 2 of the masterplan would be acceptable.

As HGV trips are now known, the issue of oversailing still remains, but as set out in points 3 and 5 above, the situation would be very similar to the level of HGV activity generated by the site as existing, or less if the single occupier referenced in the Road Safety Audit Log is secured for the site. With regard to visibility at the access point for this component of the scheme, this is still a matter needing resolution (see point 2 above).

- And finally, the access provides little or no access provision for walking and cycling (although a narrow footway is found alongside the north side of Handcross Road at this location). If offices are proposed, suitability of access for such modes needs to be considered, including access to public transport.

The separate paper 'Lot 8 PRow comments' states that as part of the proposed development, a small diversion of the existing PRow (Public Footpath 1708) route

is identified – this will relocate the footpath from the site access road to a route that routes immediately adjacent to it, before crossing the access road and then continuing north. This will enhance security of the site as well as providing a route for users of the PROW that does not directly interface with vehicles, with the exception of the crossing point.

This is noted. However, if not done so already, WSCC PROW team should be consulted for their response to this. Should permission for this not be forthcoming, the applicant should then propose an alternative route for pedestrians.

For component part 3 of the development:

1. Very little information is provided about this part of the development. As far as can be determined from the documents submitted as part of the application, access to these properties appears to be via the access arrangements for 'component 1' of this development, as detailed above. As such, there is no bespoke provision for access to these properties by non-car modes nor to facilities and services in the wider community, resulting in a reliance on car-based trips only. Applicant to provide a response to this and to show how travel by non-car modes has been considered for this part of the development.

The redevelopment of the redundant buildings has been developed in consultation with local residents and Lower Beeding Parish Council, who have expressed their support for the scheme.

The proposal for 3 residential units should be considered in the context of the fallback position associated with the conversion of the existing agricultural buildings to residential under the provisions of Class Q, which is set out in greater detail in Section 9 of the Planning Statement (ref: P2197) that accompanies the planning application.

The existing buildings can be converted to 10 residential units under Class Q, which definitively does not assess the sustainability of the location, and this must be factored into the consideration of the new dwellings. The only matters for consideration through Class Q is in relation to the acceptability of the accesses onto Hammerpond Road, which retain the existing points of access and egress, whilst significantly reducing the level of use associated with the lawful agricultural and commercial uses (with the eastern barn previously used by a scaffold company).

Notwithstanding, the proposal includes the provision of 3 new houses, a scale of development in keeping with the local area, assisting in maintaining the vitality of the local area. These dwellings will be provided with electric vehicle charging, consistent with Building Regulation requirements, to encourage the use of low/no emission vehicles as well as cycle parking in accordance with Council parking standards.

The above comments are noted. With regard to the conversion potential until Use Class Q, the case officer is invited to respond to that. With regard to access to the dwellings, no clear plan appears to be available showing this. While mention is made of access or accesses) to Hammerpond Road, the applicant still needs to provide a clear plan showing proposed access arrangements, including, amongst other matters, suitable visibility splays in both directions along the edge of the carriageway plus details of parking and turning for occupiers of the dwellings.

For ALL component parts of the site:

1. It is recommended that a Travel Plan be provided for the site (as a whole, but covering the various component parts of the overall 'masterplan').

Paragraph 4.2, found in the Addendum Transport Note provided by the transport consultants, says that Travel Plan Statements can be secured by planning condition from the commercial elements of the proposals which require the promotion of sustainable travel amongst staff – e.g. promotion of car sharing, given the existing commercial activities that would be supplemented by the re-use of the now redundant buildings.

While on this occasion a Travel Plan Statement could assist with this to some degree, the site is unlikely to be fully accessible by all transport modes given its rural location. The Highway Authority ask that one is secured for the commercial components of the scheme but that it also includes further measures, such as discounted bus and/or train ticket purchase, or the ability to permit staff to be issued with voucher towards bicycle purchase.

2. It is recommended that the TS and TN be updated to demonstrate a vision-led approach to the development, as-per NPPF requirements.

While it is noted that recent changes to the NPPF have resulted in a shift towards vision-led planning, it is important to note the nature and location of the site. Paragraph 110 of the NPPF recognises that transport solutions will vary between urban and rural areas and that this should be taken into account in decision-making.

Paragraph 89 also recognises that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport. In these circumstances, the NPPF stresses that it is important to ensure that development is sensitive to its surroundings. It also promotes the use of previously developed land.

The NPPF also promotes the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new buildings (para 88).

Against this background, the overarching vision for the site is to provide a comprehensive redevelopment of redundant buildings to maintain a commercial use of the site in the interest of the rural economy, providing jobs and business opportunity within the local area. With this, the opportunity has been taken to enhance the existing access to the former AD Plant site at Lot 8 including Road Safety Auditing of the existing access and the proposed improvements, with resolution of all matters in accordance with the Auditor recommendations, as well as improving Public Right of Way connections by diverting/rerouting the existing PROW within the site to reduce risk of conflict with vehicles as part of a wider environmental and BNG enhancement.

Travel Plan Statements can be secured by planning condition from the commercial elements of the proposals which require the promotion of sustainable travel amongst staff – e.g. promotion of car sharing, given the existing commercial activities that would be supplemented by the reuse of the now redundant buildings.

The above comments are noted. While the redevelopment might provide employment and business needs in the local community, it would still be reliant on trips by private vehicles given the limitations and lack of opportunities for non-car-based travel choice. Any 'vision' should start with demonstration of that vision being fully achieved with associated measures resulting in fewer trips in and out of the site, with a second vision being one that is less optimistic, resulting in a greater number of trips than predicted in the vision (after monitoring/review), with additional mitigation secured to try to achieve the full vision. As-per the comments made previously by the Highway Authority, access by non-car modes/Active Travel modes does not appear to have been considered (or has only been considered in a limited capacity), as was requested (see point 7 for 'component 2 of the site redevelopment and point 1 for 'component part 3 of the redevelopment). While on this occasion a Travel Plan Statement could assist with this to some degree, the site is unlikely to be fully accessible by all transport modes given its rural location.

Conclusion.

The following items require further information from the applicant:

1. Visibility information as set out in point 2 of component part 2 of the redevelopment proposal (see page 3 of this response); and,
2. Access details under point 1 of component part 3 of the redevelopment proposals (see pages 6 and 7 of this response).

Full details of what is required is set-out in the main text of this response in **highlighted green** text.

Please re-consult when the additional information is available.

Thank you.

Tim Townsend
West Sussex County Council – Planning Services