28 October 2026

Sam Whitehouse
Horsham District Council
Planning Department

SLR Project No.: 433.066669.00001

Dear Sam,

RE: DC/26/1037 – Land West of Billingshurst Road, Ashington: Response to Consultee Comments

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In response to the latest comments received pursuant to the above application from WSCC Highways (dated 14/09/26), the Council's Arboricultural Officer (dated 12/08/26), and the Council's Ecology Officer (dated 03/09/26); this letter and associated attachments set out how the applicant has addressed the matters raised such that the respective consultees can confirm support for the proposals.

Highways Matters

In comments dated 14/09/26, WSCC Highways raised no in principle objection to the proposals but sought a number of modifications and clarifications with regard to the proposed access design. In summary, the following modifications and clarifications were requested:

1. Access junction design (vehicle tracking)
2. Assessment of impacts on neighbouring driveways
3. Relocation of the 30mph signs to avoid conflicts
4. Requirement for a new Vehicle Activated Sign (VAS)
5. Associated updates to the Road Safety Audit
6. Amended highways drawings to reflect the changes

Enclosed with this letter is a Highways Response Note (**ITB210748-006**) by iTransport which provides clarification as to how each of the above matters have been addressed. In short, the following amendments have been made:

1. The access design has been reviewed to demonstrate that large vehicles can enter and exit the site safely with the proposed 6m kerb radii retained. Drawing **ITB210748-GA-012** has been provided within the Highways Response Note to demonstrate this.

2. Additional vehicle tracking has been undertaken for relevant neighbouring driveways which demonstrates that necessary turning is possible. This is presented in drawing **ITB210748-GA-013** appended to the Highways Response Note.
3. Drawing **ITB210748-GA-007D** identifies a suitable location for the 30mph sign to be re-positioned.
4. The applicant is willing to accept a condition to ensure the VAS is re-located to a suitably agreed position.
5. The amendments have been reviewed by an independent road safety auditor who confirms no residual concerns. An email confirming the Auditor's response is included within the enclosed Highways Response Note.
6. All highways' drawings have been amended as necessary to reflect the changes and are presented within the enclosed Highways Response Note.

The applicant also confirms agreement to the provision of a 2m wide surfaced route for Footpath 2491 within the site boundary and a Section 106 contribution of £12,000 for improvements to the remainder of the route as requested by WSCC Public Rights of Way in their response dated 14/09/2026.

The outstanding matters raised by WSCC Highways and WSCC Public Rights of Way have been satisfactorily addressed and that there are no remaining technical highways constraints to the proposed development.

Arboricultural Matters

The Arboricultural Officer's comments (dated 12/08/26) did not raise an objection to the scheme but noted potential impact on roadside trees resulting from the proposed footway widening along Billingshurst Road to the south of the proposed access. The Tree Officer refers specifically to a large individual tree which is protected by TPO/1496 and located outside the application site along Billingshurst Road. An image of the oak is shown in Image 1 at the end of this note.

In order to achieve improved pedestrian access between the site and the village to the south, the initially submitted access proposal by iTransport showed a short 'no dig' section of footway proposed around the oak protected by TPO/1496 to facilitate 1.5m width. Whilst WSCC deemed this to be acceptable, the Tree Officer's response noted that it was unclear how the works *"could realistically be achieved without foreseeable excavations and engineering within RPA's".*

A subsequent audit of the site indicated that the existing footway width adjacent to the oak protected by TPO/1496 is currently reduced to approximately 0.5m wide due to vegetation encroachment over the existing hardstanding, as shown on Images 2 and 3 below. The on-site audit undertaken has confirmed that it is possible to remove the existing overgrown vegetation and soil debris to enable the full width of the existing hardstanding to be utilised., This increases the available width on the stretch adjacent to the tree to 1.0m without requiring any new excavation, engineering or new footway construction or other intrusive works that could affect the tree's roots.

The revised footway widening proposals in this location are indicated with an annotation on drawing **ITB210748-GA-007D** contained within the Highways Response Note. This solution has already been shared with WSCC Highways for initial comment, and the officer response (quoted below) indicates that the LHA is content with this solution:

'Having reviewed the revised proposal, I can confirm that WSCC Highways would be willing to accept the amended arrangement shown on drawing ITB210748-GA-007 Rev C. Whilst the proposed 1.0m footway width over the approximately 8m constrained section does not meet the recommendations of Inclusive Mobility guidance or WSCC's preferred minimum footway width standards, it is acknowledged that significant Arboricultural constraints exist at this location. Given these constraints and noting that the proposal would provide a material improvement over the existing situation, where the effective footway width is currently reduced to approximately 0.5m due to vegetation encroachment, the revised arrangement is considered acceptable in highway terms'.

Given that no excavation or other intrusive works near to the Oak protected under TPO/1496 would be required, it is considered that the amended proposals for the pedestrian footway widening in this location (as shown on drawing ITB210748-GA-007D) would overcome the concerns previously raised by the Council's Tree Officer by avoiding adverse impacts. As described above, this short narrowed section would be acceptable in highway terms.

In relation to the roadside trees immediately south of the proposed new access (noted as T12 and G9 on the applicant's submitted AIA), the proposed footway widening here is achieved by a slight narrowing of the carriageway (i.e. by realigning the existing kerb line) and not extending the footway towards the trees. As such, adverse impact on the primary rooting environment is not expected.

It is anticipated that you will initiate formal re-consultation with these consultees to confirm their position, and agreement to the revised solution to confirm that all highways and arboricultural matters are therefore resolved.

Ecology Matters

The Ecology Officer's comments (dated 03/09/26) did not raise an objection to the principle of development but did raise a holding objection pending further information and modification to the BNG metric. The comments requested clarity over the ecological baseline data, and matters relating to the proposed habitat layout and ecological enhancements. In addition, more detail was sought for the Habitat Management and Monitoring Plan (HMMP).

In order to address the matters raised in the Council's holding objection, the applicant's ecology consultant CSA Environmental has provided an Ecology Response Note which has been submitted alongside this letter. The Response Note explains that corrections and clarifications have been made to the BNG Metric and BNG Assessment Report in response to the matters raised. In addition, updates to the outline HMMP have been made, which can be found in Appendix E of the BNG Assessment Report.

Alongside the submission of the Ecology Response Note, the updated BNG Assessment Report (with Appendices A-E), and updated BNG Metric in PDF and Excel format have been submitted alongside this letter for the Council's review.

The Ecology Response Note demonstrates how each point raised by the Ecology Officer has been addressed and provides clarification regarding the baseline habitat data, Biodiversity

Net Gain calculations, habitat proposals and the HMMP. We consider that the additional information submitted is sufficient to enable the Ecology Officer's holding objection to now be withdrawn

Summary

In response to the latest consultee comments, the applicant has worked proactively with its technical consultants to address the matters raised and, where appropriate, amend the proposals. The enclosed response notes, updated plans and supporting reports demonstrate how those matters have been addressed and are submitted for the Council's review

I trust that this letter and the enclosed reports and plans can be included on the application file for DC/26/1037, and that the relevant consultee can be re-consulted. Please do feel free to contact me if you have any queries regarding this submission.

Kind Regards,



Angela Moore MRTPI
Associate Planner – Environment & Social Impact Assessment

SLR Consulting Limited

Enc.

- Highways Response Note (ITB210748-006)
- Proposed Site Access Arrangement (ITB210748-GA-007 Rev D)
- Ecology Response Note (CSA-7799-04)
- Biodiversity Net Gain Assessment: Design Stage (CSA-7799-02 B)
- BNG Metric v4 (PDF)
- BNG Metric v4 (Excel)

Image 1 – TPO/1496 – Oak tree as viewed from Billingshurst Rd looking northbound

(approx. section of footway noted with red line)



Image 2 – Existing footway conditions and vegetation overgrowth in vicinity of TPO/1496

(approx. section of footway noted with red line)



Image 3 – Section of cleared vegetative overgrowth showing existing full width of footway

(approx. extent of overgrowth indicated with red lines)

