



Itchingfield Parish Council

1st July 2026

Horsham District Council
Albery House
Springfield Road
Horsham West Sussex
RH12 2GB

Dear Planning Team,

Planning application DC/25/2057: Land north of Little Slaughterford, Chapel Road, Barns Green

The Parish Council strongly objects to this application and wishes to raise further significant concerns.

Solar Generation

The Street Scene schematics depict dwellings without solar photovoltaic panels, battery storage equipment, meter access panels, or other associated infrastructure. Given current expectations for sustainable development and the widespread incorporation of renewable energy technologies within modern housing schemes, the absence of these features is both surprising and concerning.

The Parish Council is unable to establish from the submitted documentation whether these elements have been omitted from the drawings in error or whether the applicant is genuinely proposing to construct the dwellings without solar generation. Either possibility is unacceptable. If solar panels and associated equipment are intended to form part of the development, then the submitted drawings are materially misleading as they fail to accurately portray the appearance of the completed dwellings. The planning authority, consultees, and members of the public are entitled to assess the proposal on the basis of drawings that accurately reflect what is proposed to be built.

If, alternatively, the applicant is proposing a development without solar photovoltaic generation, the Parish Council considers this to be a serious failing in the scheme's sustainability

credentials. At a time when national and local planning policy places increasing emphasis on energy efficiency, carbon reduction, and climate resilience, the omission of solar generation from a development of this scale would represent a missed opportunity and an unacceptable standard for new housing.

Wastewater Infrastructure

The Parish Council also wishes to raise a further and significant objection regarding the adequacy of wastewater infrastructure serving the area.

The Council is concerned by proposals being advanced by Southern Water to close the Itchingfield Wastewater Treatment Works and transfer flows to Barns Green. The Parish Council is concerned that such changes could place additional pressure on infrastructure that is already perceived by local residents to be operating at or close to capacity.

The Parish Council remains deeply concerned by the continuing reports of sewage-related incidents affecting local watercourses and the wider environment, together with ongoing concerns regarding the capacity and resilience of the wastewater network. Against this background, the Council does not consider it appropriate to assume that existing or proposed infrastructure improvements will be sufficient to accommodate the additional wastewater generated by a development of this scale without adverse consequences.

In particular, the Parish Council is concerned that increased flows resulting from both new development and the proposed rationalisation of treatment facilities could increase the risk of sewer surcharge, sewage flooding, and pollution incidents affecting Barns Green and surrounding areas.

The Parish Council therefore requests that Horsham District Council require clear and robust evidence demonstrating that adequate wastewater treatment and sewerage capacity exists, both now and for the lifetime of the development, without increasing the risk of sewage flooding, untreated discharges, or environmental harm. In the absence of such evidence, the Parish Council considers that the application fails to demonstrate that the necessary infrastructure is available to support the proposed development.

Additional Planning Application and Cumulative Impact Considerations

We also wish to draw attention to a further planning application relating to the adjacent land, which has been submitted but has not yet been validated. While we appreciate that this application has not yet entered the formal determination process, it will be relevant to the wider planning context and should be taken into account if it is validated during the consideration of this current application.

We are concerned that consideration is not being given to access issues for the BGR2 site identified in the Reg 19 Local Plan (land South of Muntham Drive). A combined strategy for both sites would seem appropriate on grounds of nuisance caused during development, traffic flow and road safety.

Should that application be validated before a decision is made on the present proposal, we respectfully request that the Council considers any implications arising from the relationship between the two proposals and, where appropriate, assesses their cumulative impacts.

Design, Character and Layout

We are concerned that the proposed development has not yet demonstrated that the style, scale, layout and appearance of the new housing would be appropriate for this prominent central village location. The illustrative material submitted with the application is insufficient to establish that the development would respond positively to the character, identity and distinctiveness of the village or integrate successfully with its surroundings.

We therefore request that the applicant undertakes further consultation with the Parish Council and the local community, supported by more detailed design information, to ensure that the scheme reflects local character and delivers a high-quality development appropriate to its setting, without prejudicing our stated opposition to the development.

Highways

In considering matters relating to highways, we request you to refer to the accompanying JR Transport Technical Note, which has been prepared by specialist transport consultants and should be read in conjunction with this representation.

This objection is made in addition to, and should be read alongside, all previous objections and concerns raised by the Parish Council in respect of this application. Nothing within this representation should be taken as withdrawing, qualifying, or superseding any of the Parish Council's earlier objections. Rather, this submission identifies additional and significant concerns that further reinforces the Parish Council's strong objection to the proposed development.

Accordingly, the Parish Council maintains its strong objection to this application.

Kind regards

Alan Strudley - Chairman
On behalf of Itchingfield Parish Council

Document: Response to iTransport Note dated
16th June 2026
Site: Land south of Smugglers' Lane Barns
Green, Horsham
Date: June 2026



Context

- 1.1 This Technical Note is prepared in relation to planning application reference DC/25/2057 that seeks permission for a proposed development of 68 dwellings ('the Proposed Development') on Land South of Smugglers' Lane Barns Green, Horsham ('the Site').
- 1.2 It provides a response to comments made by iTransport in their technical note dated 16th June 2026 entitled "Land south of Smugglers Lane, Barns Green: Transport Appraisal Response to Itchingfield Parish Council" ('the iTransport Report'). The original Itchingfield Parish Council transport report is hereafter referred to as the IPC Transport Report.
- 1.3 The iTransport Report responds to matters of disagreement with the IPC Transport Report covering the following:
 - Application of the Connectivity Tool
 - Planning Permission DC/19/2052 Herons Reach;
 - Road Safety Audit; and
 - Use of roundabouts in the cycle network.
- 1.4 These are considered in turn below.

Application of the Connectivity Tool

- 1.5 Section 2 of the iTransport Report assesses the connectivity of the Appeal Site relative to other locations within the local authority area arguing that in the context of Horsham District, with all other matters remaining equal, the Site achieves a relatively good connectivity score.
- 1.6 The relative local authority score is a useful tool for assisting local planning authorities (LPAs) in considering sustainable transport opportunities at the earliest stages of plan-making. It enables LPAs to identify those locations with the greatest potential to accommodate sustainable development.
- 1.7 However in developing their strategic spatial strategy, LPAs must also consider other relevant evidence, including:
 - the need to provide walking infrastructure, such as surfaced and lit footways or footpaths, to realise a location's full walking connectivity potential;
 - the need to provide cycle infrastructure, including appropriate segregation or protection, to maximise cycling connectivity;
 - the potential for infrastructure improvements and/or other mitigation measures, such as new or revised bus services, which could improve a location's connectivity score; and/or

- the provision of supporting land uses as part of planned development, such as local shops, schools and other community facilities, which may increase a location's connectivity score.
- 1.8 In summary, the relative local authority score is an appropriate tool for assisting LPAs in developing a strategic spatial strategy that makes effective use of existing infrastructure as a starting point.
- 1.9 By contrast, in her ministerial statement of 11 December 2025, the Secretary of State (SoS) for Transport made clear that the development of the Tool was a response to the absence of a commonly agreed evidence base for assessing connectivity. The SoS stated that the Tool is intended to serve as a "national metric of connectivity". The SoS makes no reference to the Tool being applied on a relative basis subject to where a person may or may not live in the country.
- 1.10 Furthermore, the National Planning Policy Framework applies sustainability criteria equally across all local planning authority areas. It does not seek to differentiate between someone living in Horsham or someone living in North Tyneside. It little benefits a resident of a new development with poor actual transport connectivity that they could be worse off if they lived somewhere else in the same LPA area.
- 1.11 It is therefore very clear that **the national metric is the appropriate measure for assessing the connectivity of individual development sites**. The relative local authority score, by comparison, is intended primarily to support LPAs during the early stages of plan-making.
- 1.12 It is further noted that the iTransport Report takes no issues with the details of paragraphs 5.4 to 5.18 of the IPC Transport Report, which are accordingly assumed to be agreed by the Applicant. Paragraphs 5.4 to 5.18 of the IPC Transport Report conclude that *"the limited and impractical public transport provision, together with the absence of suitable cycling infrastructure, fails to provide a genuine choice of transport modes"*.

Permitted Development DC/19/2052 Herons Reach

- 1.13 At paragraph 3.3, with regards to permitted development DC/19/2052, the iTransport report states:
- 'The planning permission from 2019 was never implemented and has now lapsed. There is therefore no extant permission in place.'*
- 1.14 It is a matter of record that reserved matters applications for, inter alia, drainage and landscaping for permitted development DC/19/2052 have been submitted and approved. These include details of drainage of the permitted access road.
- 1.15 Furthermore, far from having lapsed, it is a matter of observation that the construction of a detached dwelling house on the eastern side of the permitted development site has already been completed in accordance with permitted development DC/19/2052.

- 1.16 So whilst it is correct that not all the development permitted by planning permission DC/19/2052 has been built yet, it is clear that the planning permission has been implemented in accordance with Condition 1 of the planning permission (to commence within 3 years) and that delivery of the remaining permitted development is a matter of timing.
- 1.17 The conclusions of the IPC Transport Report regarding the adverse and unacceptable road safety conflict with permitted development DC/19/2052 remain valid.

Road Safety Audit

- 1.18 The iTransport Report makes no attempt to address the highway deficiencies identified in the IPC Transport Report. In summary these are:
- The County Highway Authority (CHA) response focuses almost entirely on vehicle movements and fails to properly consider pedestrians, cycling, placemaking, or wider highway safety principles.
 - The CHA does not acknowledge the approved Herons Reach Permitted Development, despite this scheme altering the surrounding highway environment and affecting the proposed access arrangements.
 - The proposed parking spaces are inadequately sized, making safe and convenient vehicle manoeuvring difficult and increasing the risk of conflicts, obstructions, and unsafe reversing movements.
 - The Stage 1 Road Safety Audit (RSA1) is of limited value because it was undertaken using GG119, a standard primarily intended for motorways and trunk roads rather than local residential developments.
 - The RSA1 is further undermined because it assessed drawings that failed to reflect changes to the street environment arising from the Herons Reach Permitted Development.
 - If a DMRB assessment were considered necessary, GG142 (Walking, Cycling and Horse-Riding Assessment and Review) would be more relevant as it addresses the needs of non-motorised users.
 - A Quality Audit, as recommended in *Manual for Streets 2*, would provide a more appropriate and proportionate assessment, considering safety, accessibility, urban design, and placemaking in a local street context.
 - Although access works could be delivered through a future Section 278 Agreement, this does not remove the need for the Local Planning Authority to be satisfied that the access is safe and suitable at the planning application stage.
 - Reliance on a future Section 278 process to address fundamental design deficiencies is inappropriate, as it places essential design matters outside the planning process and undermines the integrity of decision-making.
- 1.19 In short, the CHA Response fails to adequately consider key aspects of highway safety and design, particularly in relation to pedestrians, cyclists, and overall placemaking. Its reliance on inappropriate standards and processes, together with an overreliance on post-

permission mechanisms such as Section 278 agreements, does not provide a robust basis for concluding that the Proposed Development is safe or policy-compliant. Accordingly, there is a clear and justified basis for HDC to reject the proposed access arrangements in their current form.

Use of roundabouts in the cycle network.

- 1.20 Paragraph 4.30 of the IPC Transport Response identifies the need for a more holistic, placemaking-led approach to highway access, reflecting the sensitive location of the proposed site access.
- 1.21 Rather than merely advocating such an approach, paragraphs 4.30 to 4.38 of the IPC Transport Response illustrate one example of how these principles could be applied in practice. The response does not suggest that this represents the only possible solution.
- 1.22 The iTransport Response appears to focus solely on the reference to a roundabout, asserting at paragraph 3.8 that roundabouts can be daunting for cyclists, citing West Sussex County Council (WSCC) guidance published in 2019. However, the Government's current guidance on cycle infrastructure design, *Local Transport Note 1/20 (LTN 1/20)*, which post-dates the 2019 WSCC guidance, states that:
- "Compact (sometimes known as Continental style) roundabouts have a tighter geometry that is more cycle friendly than most existing UK roundabouts... As the geometry encourages lower speeds, cyclists can use the carriageway to pass through the roundabout in the primary position"; and
 - "Mini-roundabouts can work well for cycling in a mixed traffic environment."
- 1.23 Consequently, far from being intimidating to cyclists, the provision of a compact or mini-roundabout, when incorporated within a wider traffic-calming scheme designed to reduce vehicle speeds, has the potential to improve conditions for cyclists and enhance overall highway safety.
- 1.24 The iTransport Report, at Image 3.1, compares the scale of the Applicant's proposed priority junction with that of a compact roundabout, implying that a compact roundabout would be excessively large. However, the compact roundabout illustrated is intended only as an example of a potential intervention that could improve road safety along Chapel Lane, particularly in the vicinity of the village shop and public house. It is not presented as the sole design solution. Numerous examples exist across the country of sensitively designed mini and compact roundabouts that integrate successfully within their surroundings, including through the careful selection of surfacing materials and other design features.

- 1.25 Image 3.1 also illustrates the Applicant's proposed priority access junction and clearly demonstrates that the proposed access, located directly opposite the village shop, is in fact wider than the approved shop building itself.

Conclusion

- 1.26 The iTransport Report does not materially undermine the conclusions reached within the IPC Transport Report. In several important respects, it fails to engage with the substantive transport and highway safety concerns raised, particularly in relation to sustainable transport accessibility, the implications of the implemented Herons Reach development, and the suitability of the proposed access arrangements.
- 1.27 The evidence demonstrates that the proposed development would be served by a location with limited opportunities for sustainable travel and that the proposed access arrangements have not been shown to provide a safe, attractive and policy-compliant environment for all highway users. In particular, insufficient consideration has been given to pedestrians, cyclists and placemaking objectives, contrary to the principles set out in national policy and guidance.
- 1.28 Furthermore, reliance on future design refinement through the Section 278 process cannot reasonably overcome fundamental concerns regarding the acceptability of the access proposals at the planning application stage. The Local Planning Authority must be satisfied, at the point of determination, that the means of access is safe, suitable and capable of accommodating all users.
- 1.29 Accordingly, the concerns identified within the IPC Transport Report remain valid and unresolved. The current evidence does not provide a robust basis for concluding that the Proposed Development would deliver safe, sustainable and policy-compliant transport outcomes, and significant weight should therefore be afforded to these unresolved transport and highway objections in the determination of the application.