



Itchingfield Parish Council

28th May 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

Addendum representation on behalf of Itchingfield Parish Council

Itchingfield Parish Council writes further to its objection dated 5 February 2026. The Parish Council has reviewed the amended submission dated 2 April 2026 and has commissioned an independent highways review by John Russell Transport Planning, which is appended to this letter.

This letter and the highways review should be read alongside the Parish Council's original representation.

For the avoidance of doubt, the Parish Council maintains its strong objection and requests that planning permission is refused.

You will also appreciate, given the extent of local objection to the scheme as set out in the representations the District Council has received to date, that the Parish Council's views also reflect the consensus of the local community, and that whilst new residential development within the parish that accords with the Neighbourhood Plan would be supported, development proposals that do not accord with the development plan and which will result in numerous harmful impacts, should be refused.

The amendments to the scheme proposed by the applicant do not overcome the proposal's conflict with the adopted development plan. Nor do they address the Parish Council's concerns regarding landscape harm, the loss of the Chapel Road hedgerow, harm to the rural edge of Barns Green, highway and pedestrian safety, car dependency, open space provision, affordable housing mix and deliverability, and impacts on the local community and village facilities.

The applicant presents the amendments positively. However, when assessed against the development plan and the evidence now before the Council, they do not materially change the planning balance. Recent consultee responses reinforce many of the Parish Council's original concerns.

The changes

The Parish Council notes that the amended submission includes:

- changes to the housing mix;

- revisions to the layout and appearance of some plots;
- revised landscaping, including rain gardens, tree planting and changes to the ancient woodland edge;
- a four-space gravel car park near the shop and pub;
- revised landscape, drainage, air quality, arboricultural and biodiversity information; and
- further responses to consultee and public comments.

The Parish Council is disappointed that the applicant has not sought to engage with it since the original objection was submitted. The Parish Council remains willing to discuss whether its concerns can be addressed.

The development plan remains the starting point

The Parish Council's earlier representation set out the status of the Itchingfield Neighbourhood Plan and the need to determine the application in accordance with the development plan unless material considerations indicate otherwise.

That position remains unchanged.

The development plan comprises:

1. the Itchingfield Neighbourhood Plan 2024 to 2031;
2. the Horsham District Planning Framework 2015 to 2031; and
3. other relevant adopted development plan documents.

The Itchingfield Neighbourhood Plan was made on 8 October 2025. It is the most recent part of the development plan for the parish. It identifies how housing growth should be accommodated and confirms the Built-Up Area Boundary for Barns Green. The application site lies outside that boundary and is not allocated for residential development.

As set out in the Parish Council's original submission, the site was considered through the neighbourhood plan process and was not selected for allocation. The Neighbourhood Plan provides for housing growth in a planned and locally supported way, through identified sites and windfall development within the Built-Up Area Boundary.

The proposal therefore conflicts with the Itchingfield Neighbourhood Plan, including Policy 11, and with the spatial strategy in the Horsham District Planning Framework, including Policies 2, 3, 4 and 26, which seek to direct development to sustainable locations and protect countryside outside defined settlements.

The applicant refers to the site as a draft allocation in the emerging Horsham District Local Plan. This does not materially alter the position. The emerging Local Plan is not adopted and, given the current stage of examination, it is questionable what weight can be given to it, but given its current draft status it cannot override the recently made Neighbourhood Plan or establish the principle of development.

The Parish Council therefore remains firmly of the view that the proposal is contrary to the adopted development plan in principle.

The Parish Council also maintains that paragraph 14 of the NPPF is engaged. The Itchingfield Neighbourhood Plan became part of the development plan less than five years ago and contains policies and allocations to meet its identified housing requirement.

In those circumstances, national policy is clear that adverse impacts are likely to significantly and demonstrably outweigh the benefits. The amendments to the proposed development do not remove that conflict. The delivery of 68 dwellings can be considered a benefit, but it is not enough to set aside the neighbourhood plan strategy, particularly where significant harms and technical objections remain.

Landscape, settlement edge and loss of hedgerow

The Parish Council's original representation raised concerns about the impact on the landscape setting of Barns Green, the loss of the Chapel Road hedgerow, harm to the settlement edge and the suburbanising effect of the development.

Those concerns remain.

The further response from Place Services is particularly important. Place Services remains "*not supportive on landscape grounds*". It considers that the applicant's LVIA continues to underplay the magnitude of change, particularly in relation to the loss of grassland, the complete removal of the managed hedgerow along Chapel Road, and the effect on pedestrian users of Chapel Road.

The applicant argues that replacement hedgerow planting and an overall increase in hedgerow units address the loss. Replacement hedgerow may assist with biodiversity net gain, but it does not address the planning harm identified by the Parish Council and Place Services. Replacement planting further west into the site may have ecological value over time, but it would not mitigate the loss of the enclosed, green and rural character of Chapel Road. The existing hedgerow is not simply a biodiversity feature, it is a defining landscape and settlement-edge feature.

The Parish Council maintains that removing the Chapel Road hedgerow would cause significant and unnecessary harm to local character. This is directly relevant to Itchingfield Neighbourhood Plan Policies 1, 5 and 12, HDPF Policies 25, 26 and 31, and the NPPF requirement for development to respond positively to local character and conserve and enhance the natural environment.

Place Services has also said the layout should be revised to retain the roadside hedgerow, including by moving the swale further west into the site. The applicant has not done this. In the Parish Council's view, retaining the hedgerow should be a core design and landscape requirement, not something to be traded off against the applicant's preferred layout.

The Parish Council also notes Place Services' concern about Plot 55 and the Ancient Woodland buffer. Place Services advises that Plot 55 should be removed to respect the buffer, improve safety along the southern boundary and reduce the risk of future encroachment. This further shows that the layout has not been properly led by the site's context, character and constraints.

The proposal therefore remains in conflict with Itchingfield Neighbourhood Plan Policies 1, 5 and 12, and HDPF Policies 25, 26 and 31.

Open space, play and recreation

The Parish Council notes the response from Horsham District Council's Parks and Countryside team. This response identifies that the applicant has used Fields in Trust standards rather than Horsham District Council's Open Space, Sport and Recreation Review standards. When assessed against the correct standards, the development's open space provision is significantly and materially deficient.

The Parks and Countryside response identifies a total open space requirement of 7,590 sqm and proposed provision of 5,405 sqm, thereby resulting in a deficiency of 2,185 sqm. In particular, the response identifies:

- no allotment provision, against a requirement of 294 sqm;
- a shortfall in play and youth provision;
- a significant deficiency in natural green space; and
- the need to adjust amenity space calculations to account for the new car park.

The Parks and Countryside team has identified ways some matters might be addressed, including an allotment contribution and possibly counting the attenuation basin and ancient woodland buffer as natural green space. However, that does not make the current scheme acceptable. It confirms that it remains deficient. Put simply, the development is too cramped, with too many houses and too little open space.

The applicant's open space strategy appears to have been fitted around the housing layout and drainage requirements, rather than planned as an integrated, accessible and high-quality community asset. The need to count engineered drainage features as natural green space shows the weakness of the approach.

The Parish Council supports the recommendation that the play provision should be revised to meet the needs of a wider age range, particularly upper primary age children, given the existing deficiency in Barns Green. This is not a minor detail. Sufficient and appropriate play provision are key factors in the consideration of whether the development provides suitable community infrastructure and meets local needs.

The Parish Council also remains concerned about the connectivity of the LAP to the existing settlement. The use of "mown paths" gives the impression that the front of the site is well connected. In reality, there is only one self-binding gravel path to this space, leading from within the development. As a minimum, the path connecting the car park at the front of the site to the LAP should be hard surfaced and usable year-round by all users.

These matters are relevant to Itchingfield Neighbourhood Plan policies concerning green infrastructure, design and community infrastructure, and to HDPF Policies 31, 39 and 43.

Highways, access and sustainable transport

The Parish Council's original representation raised concerns regarding traffic, highway safety, pedestrian safety, access arrangements, parking impacts and car dependency.

The applicant's amended submission seeks to rely on the absence of an objection from the Highway Authority and identifies the provision of a four-space gravelled car park near the site access.

To test its concerns, the Parish Council commissioned independent highways advice. That advice (set out in a review report by John Russell Transport Planning, as appended to this representation) reaches a fundamentally different conclusion to the highways/access case presented by the applicant. The review concludes that the site performs very poorly in sustainability terms, with the Department for Transport Connectivity Tool placing it within the lowest 10th percentile nationally for sustainable transport connectivity. Walking and public transport connectivity are particularly poor, whilst cycling connectivity does not account for real-world route quality or safety.

The review also notes high car dependence in Barns Green and concludes that the development would be highly car-dependent. This is directly relevant to NPPF paragraph 110, which requires significant development to be focused in locations which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes.

This proposal does not provide such a choice.

The Parish Council also remains concerned about the location of the site access. It would sit directly opposite the village shop, (whether as existing or as approved under HDC ref DC/19/2052), close to the Queens Head public house, in the part of Chapel Road where pedestrian movements, parking manoeuvres and short-stay vehicle activity are likely to be greatest. The redevelopment of the village shop, as permitted by DC/19/2052, intends both deliveries and customer parking for the shop to continue to be on Chapel Road.

The independent review identifies likely conflict between:

- vehicles entering and leaving the development;
- pedestrians crossing to and from the village shop and pub;
- vehicles manoeuvring into and out of on-street parking spaces;
- potential delivery vehicle movements;
- displaced parking activity; and
- cyclist movements through widened carriageway sections and build-outs.

The four-space gravel car park does not resolve these concerns. It also raises further questions, including:

1. whether gravel is suitable for regular use, or whether the surface should be tarmac;
2. who will maintain it and prevent gravel being dragged onto the highway; and
3. how it will be kept for village use rather than becoming overflow parking for the new houses.

At best, the car park merely provides a small number of 'extra' parking spaces within the local area. It does not, however, address the poor location of the site access, highway geometry, build-outs, pedestrian visibility, parking displacement, or the wider effect on Chapel Road.

The independent review also raises concern that the proposed on-street parallel parking dimensions appear unrealistic. If the spaces cannot be used safely and conveniently, the scheme risks worsening parking pressure and encouraging unsafe parking around the shop and pub.

The independent review also notes that these significant highway concerns are further reinforced when consideration is given to extant permission DC/19/2052, and notes that the implementation of that permission "*materially alters the highways context from that assessed by the applicant*" and the highways mitigation proposed by the applicant would be either ineffective or incapable of implementation.

The Parish Council agrees with the independent review that fundamental access and highway safety matters cannot simply be left to a future section 278 process. To be acceptable, safe and suitable access must be demonstrated and shown to be deliverable at the point of determination. On the evidence before the Council, this has not been done.

The proposal is therefore contrary to the transport and design objectives of the development plan, including HDPF Policy 40, and NPPF paragraphs 110, 115 and 116.

Affordable housing mix, local need and deliverability

The Parish Council recognises the importance of affordable housing. It does not object in principle to genuinely needed affordable homes in sustainable and appropriate locations. However, a scheme is not acceptable simply because it includes affordable housing.

The key question is whether the scheme would deliver homes that meet local need, in a location where they are likely to be occupied and sustainable in practice.

Housing Officers have identified a need for affordable housing in Itchingfield and Barns Green, but have also raised concerns about the mix and deliverability of the proposed affordable homes. The HDC Housing response identifies 151 households on the Housing Register for Itchingfield and Barns Green, with the greatest need being for three and four-bedroom homes. Those households represent 61% of current demand and face the longest waits. The applicant has amended the

affordable housing mix and states that three and four-bedroom units would now make up 10 of the 24 affordable homes. In percentage terms 10 units equates to 41.67%, well below the 61% need identified. The Parish Council accepts the amended mix now proposed by the applicant is an improvement to that originally proposed, but it still falls some way short of addressing local need.

The Parish Council is also concerned that the affordable housing case being presented focuses too much on headline housing numbers, rather than whether the homes are deliverable and suitable for Barns Green. Housing Officers note that 24 affordable units may be a relatively small scheme for Registered Providers, and that Barns Green may be seen as a less attractive location. The Officers also identify a risk that, without early Registered Provider confirmation, the applicant may later seek a commuted sum instead of on-site affordable housing.

That concern is not theoretical. The Parish Council is aware that the recent development at Sumners Ponds remains largely unsold, with the developers website indicating that only 9 of the 32 units have been sold/reserved at the time of writing. This raises a real concern that housebuilders are not delivering the right homes in the right locations for the local market and local need. Adding more housing to Barns Green will not solve that problem if the location, mix, tenure and price do not match demand.

This is especially important given the settlement's poor connectivity. Poor connectivity can increase household transport costs and make occupation less practical, particularly for lower-income households. The Parish Council is concerned that the scheme may provide affordable housing on paper, but not in a form or location that properly meets need.

The Parish Council therefore agrees with Housing Officers that further reassurance is needed before significant weight can be given to the claimed affordable housing benefit. This should include evidence of Registered Provider interest and confirmation that the proposed mix and tenure are deliverable on site.

Until then, the affordable housing 'benefit' should be treated with caution and afforded limited weight in the planning balance.

Local businesses and village facilities

The Parish Council remains concerned about the impact on existing village facilities, particularly the shop/post office and the Queens Head public house.

The applicant proposes a four-space gravel car park. However, for the reasons set out above, this is not adequate mitigation.

The issue is not simply the number of spaces. It is the combined effect of the access, highway widening, changed parking, construction activity, pedestrian movements and delivery needs on the day-to-day operation of the village centre. The shop and pub are important community facilities. Harm to their access, visibility, servicing or customer convenience would have wider detrimental social and community effects.

The applicant has not provided a robust assessment of the operational impacts on these businesses, either during construction or once the development is occupied. This is relevant to the social dimension of sustainable development and policies seeking to protect community facilities and settlement vitality.

Drainage and the relationship with landscape design

The Parish Council notes that the applicant has submitted revised drainage information and relies on the absence of objection from the Lead Local Flood Authority, subject to conditions.

However, drainage cannot be considered in isolation. A key issue is that the drainage strategy appears to be driving the removal of the Chapel Road hedgerow and the urbanising reconfiguration of the site frontage. Place Services has expressly noted that the roadside hedgerow could be retained by relocating the swale further west into the site.

The Parish Council therefore considers that the drainage strategy remains inadequately integrated with the landscape and design strategy. A technically workable drainage solution is not necessarily an acceptable planning solution if it causes avoidable harm to landscape character, the settlement edge and the rural approach to Barns Green.

If the Council is minded to continue discussions and negotiation with the applicant, it should require the applicant to revisit the drainage and layout strategy to retain the Chapel Road hedgerow and better respond to the site's landscape constraints.

Planning balance

The Parish Council recognises that the proposal would deliver housing, including affordable housing. However, those benefits must be considered in the correct policy context.

This is not an allocated site in the adopted development plan. It is not within the Built-Up Area Boundary. It conflicts with the recently made Itchingfield Neighbourhood Plan. It would result in significant landscape and visual harm, including the loss of a valued roadside hedgerow and harm to the rural settlement edge. It raises unresolved concerns regarding the Ancient Woodland buffer, open space provision, affordable housing deliverability, sustainable transport, highway safety and the operation of existing village facilities.

The amended scheme does not remove those harms. In several respects, the post-amendment consultee responses reinforce the Parish Council's position. Place Services remain not supportive on landscape grounds. Parks and Countryside identifies deficiencies in open space provision when assessed against the correct HDC standards. Housing Officers identify concerns regarding mix and deliverability. The independent highways review identifies significant concerns regarding sustainable transport connectivity, car dependency, access safety and the adequacy of the highway design.

The Parish Council therefore considers that the adverse impacts of the proposal would significantly and demonstrably outweigh the benefits, particularly having regard to NPPF paragraph 14 and the conflict with the recently made Neighbourhood Plan.

Conclusion

The Parish Council maintains its objection to planning application DC/25/2057 and respectfully requests that Horsham District Council refuses planning permission.

Kind regards,

Alan Strudley - Chairman

On behalf of Itchingfield Parish Council

Enclosed: Transport Appraisal (John Russell Transport Planning, April 2026)

1.0 INTRODUCTION

- 1.1 This report 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 The report is prepared as at 19th March 2026 and is based on documents available comprising:
- Transport Statement: Land south of Smugglers Lane, Barns Green prepared by i-Transport and dated September 2025 (hereafter referred to as 'the TS'); and
 - Travel Plan: Land south of Smugglers Lane, Barns Green prepared by i-Transport and dated September 2025 (hereafter referred to as 'the TP').
- 1.3 This report considers the following topics:
- Relevant Transport Policy;
 - Connectivity to facilities and amenities;
 - Highway Access; and
 - The County Highway Authority position.
- 1.4 A summary and conclusion is provided at the end of this report, which is that as submitted, the proposals do not provide safe and suitable access for all users and is inconsistent with the objectives of the NPPF to promote sustainable development and safeguard highway safety.

2.0 TRANSPORT PLANNING POLICY

- 2.1 The Government's planning policies for England are set out in the National Planning Policy Framework ("the NPPF"), published in December 2024 and updated with minor technical corrections in February 2025. The NPPF highlights the need for close coordination between land-use planning and transport planning to support sustainable development.
- 2.2 Paragraph 110 of the Framework states the following:

'The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

2.3 It is noted that paragraph 110 does not require that every location considered for development must have access to every sustainable mode of travel. It does, however, require that the choice of transport modes should be 'genuine'.

2.4 The NPPF provides no definition of the term 'genuine' with reference to choice of transport modes. The inclusion of the term 'genuine' must logically signal the government's intention that the mere presence of transport modes does not meet the policy requirements. Instead, the choice of transport modes should be sufficiently attractive that people could reasonably be expected to use them. In the alternative, the government could have omitted the word 'genuine' and simply required 'a choice of transport modes'.

2.5 Paragraph 115 of the Framework states the following:

'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) *sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) *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.'*

2.6 Subject to demonstrating that a site is sustainable, Paragraph 116 provides guidance regarding the transport related circumstances in which planning permission can be withheld or refused stating:

'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'

2.7 These policies, read in combination with the NPPF as a whole, form the planning basis for determining all planning applications.

3.0 SUSTAINABLE TRANSPORT CONNECTIVITY

3.1 The Department for Transport (DfT) Connectivity Tool provides a publicly accessible, scores-based view of the Department's national connectivity metric. It indicates how well locations are connected to everyday destinations by walking, cycling and public transport, allowing an assessment of sustainable transport accessibility.

- 3.2 The Connectivity Tool has been designed primarily for professionals working in spatial planning, transport planning and the wider built environment sector. It supports plan-makers and decision-makers in identifying locations where development may be most sustainably located, and in understanding the transport infrastructure that may be required to support future growth.
- 3.3 The tool assists practitioners in assessing the connectivity of locations across England and Wales. It enables users to:
- display how any location is connected to everyday services by walking, cycling, driving and public transport; and
 - model potential new transport routes in order to understand how such interventions could affect overall connectivity.
- 3.4 The DfT model identifies a range of destinations that people may reasonably need to access in their daily lives. These destinations fall within the following broad categories:
- education;
 - leisure and community facilities;
 - employment;
 - healthcare;
 - shopping; and
 - social visits.
- 3.5 It should be noted that the Connectivity Tool does not assess the quality of routes used to access destinations. For example, there is currently insufficient nationwide data regarding factors such as pavement quality, lighting, perceived safety, or the suitability of cycling infrastructure. In the case of cycling, the tool assesses distance only, rather than the safety or attractiveness of the route. In practice, these qualitative factors can significantly influence whether people choose to travel by active modes. The Connectivity Tool therefore provides a measure of potential connectivity, while detailed assessment of route quality and necessary infrastructure improvements must be undertaken separately by designers and transport professionals.
- 3.6 Connectivity scores are expressed as a percentage relative to the most connected locations in England and Wales. For example, a score of 50% indicates that a location has half the level of connectivity of the most connected areas. Importantly, this does not represent “average connectivity”. The Department for Transport clarifies that average connectivity corresponds to a higher score. Further clarification is provided by DfT below:

Overall	
10th percentile	38.9
20th percentile	52.1
30th percentile	58.6
40th percentile	63.1
Median	66.8
60th percentile	70.2
70th percentile	73.7
80th percentile	77.8
90th percentile	83.2

- 3.7 Based on the DfT guidance, average connectivity is typically represented by an overall score of approximately 65%. Locations with scores in the 30–39% range fall within the lowest 10% of connectivity across England and Wales, indicating relatively poor access to destinations by sustainable transport modes.
- 3.8 Figure 3.1 illustrates the sustainable transport connectivity score for the Site, considering all sustainable modes except driving. The Connectivity Tool displays results using a colour scale ranging from red (most connected) to violet (least connected).



Figure 3.1: DfT Connectivity Tool – All Sustainable Transport Modes'

- 3.9 The figure indicates that the Site has a connectivity score of 31, placing it within the lowest 10th percentile of the sustainable transport connectivity scale.
- 3.10 Figure 3.2 below illustrates the connectivity score specifically for walking.



Figure 3.2: DfT Connectivity Tool – Walking

- 3.11 The figure indicates that, for walking alone, the Site scores 29, which is lower than the overall sustainable transport connectivity score and places it firmly within the lowest 10th percentile of the sustainable transport connectivity scale with regards walking.
- 3.12 Figure 3.3 below illustrates the connectivity score specifically for cycling.

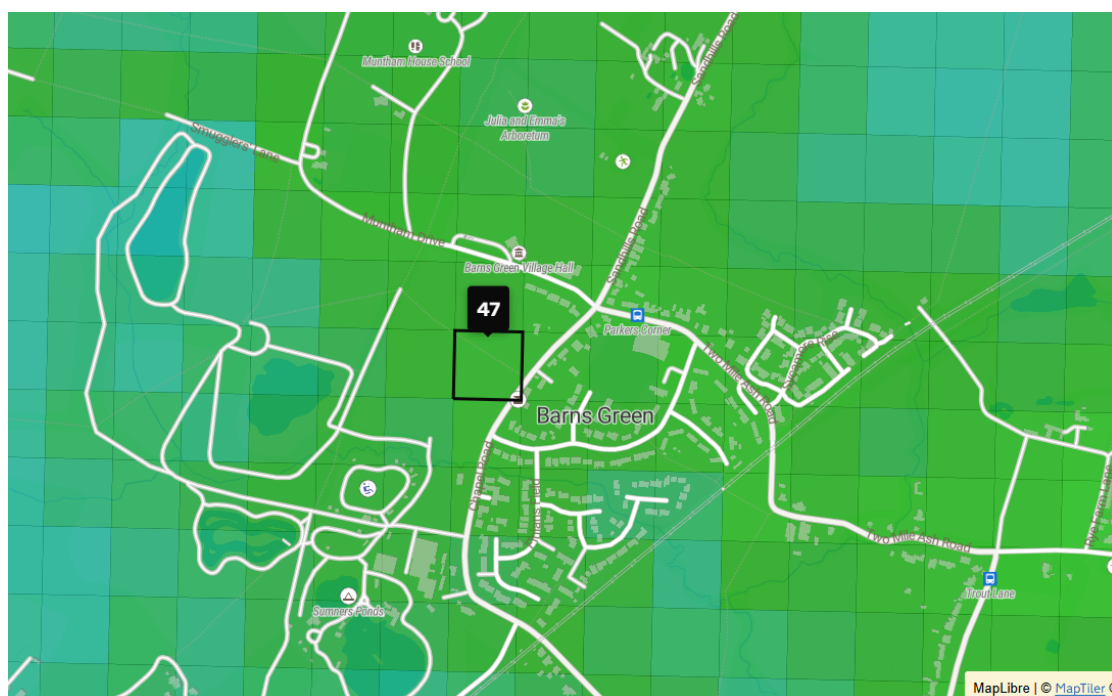


Figure 3.3: DfT Connectivity Tool – Cycling

3.13 The figure indicates that, for cycling alone, the Site scores 47, which is higher than the overall sustainable transport connectivity score, although it still falls within the lower percentiles. This suggests that the overall sustainable transport score is dependent on a comparatively stronger cycling connectivity.

3.14 Figure 3.4 below illustrates the connectivity score specifically for public transport

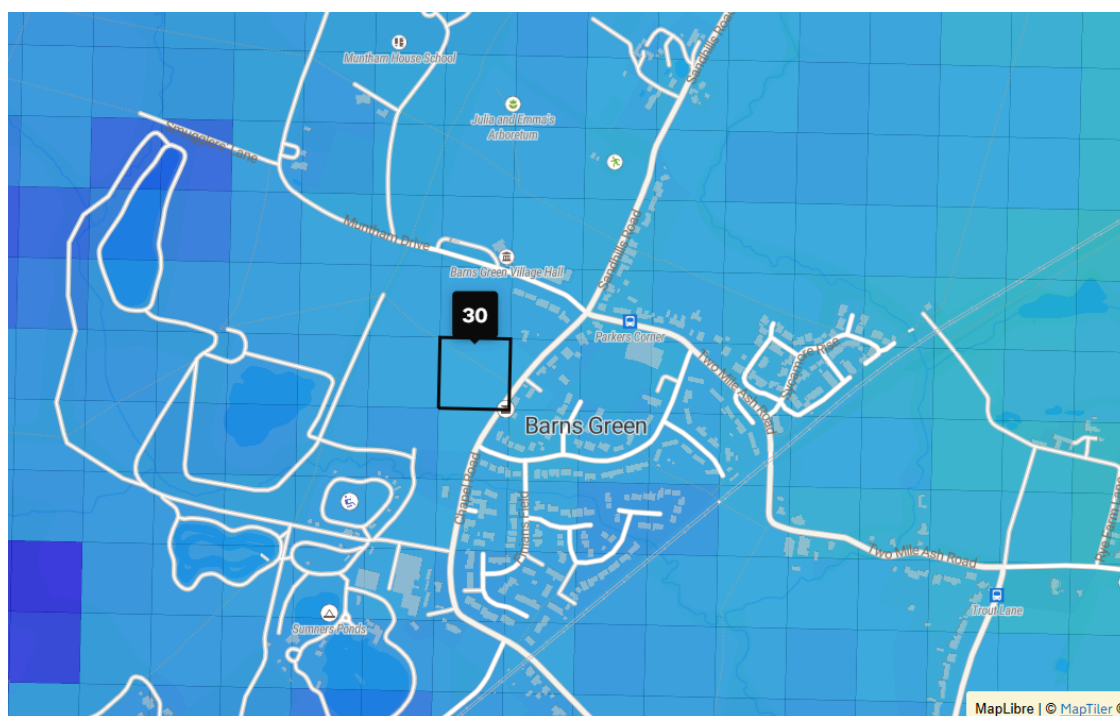


Figure 3.4: DfT Connectivity Tool – Public Transport

3.15 The figure indicates that, for public transport alone, the Site scores 30, which is lower than the overall sustainable transport connectivity score and places it firmly within the lowest 10th percentile of the sustainable transport connectivity scale with regards public transport.

3.16 The analysis above indicates that residents of the Site would be comparatively reliant on cycling in order to access services and facilities. However, it is noted that the Connectivity Tool does not take into account the quality, safety or attractiveness of cycling routes, which are important determinants of whether cycling is a realistic transport option.

3.17 For comparison, Figure 3.5 illustrates connectivity by driving only.

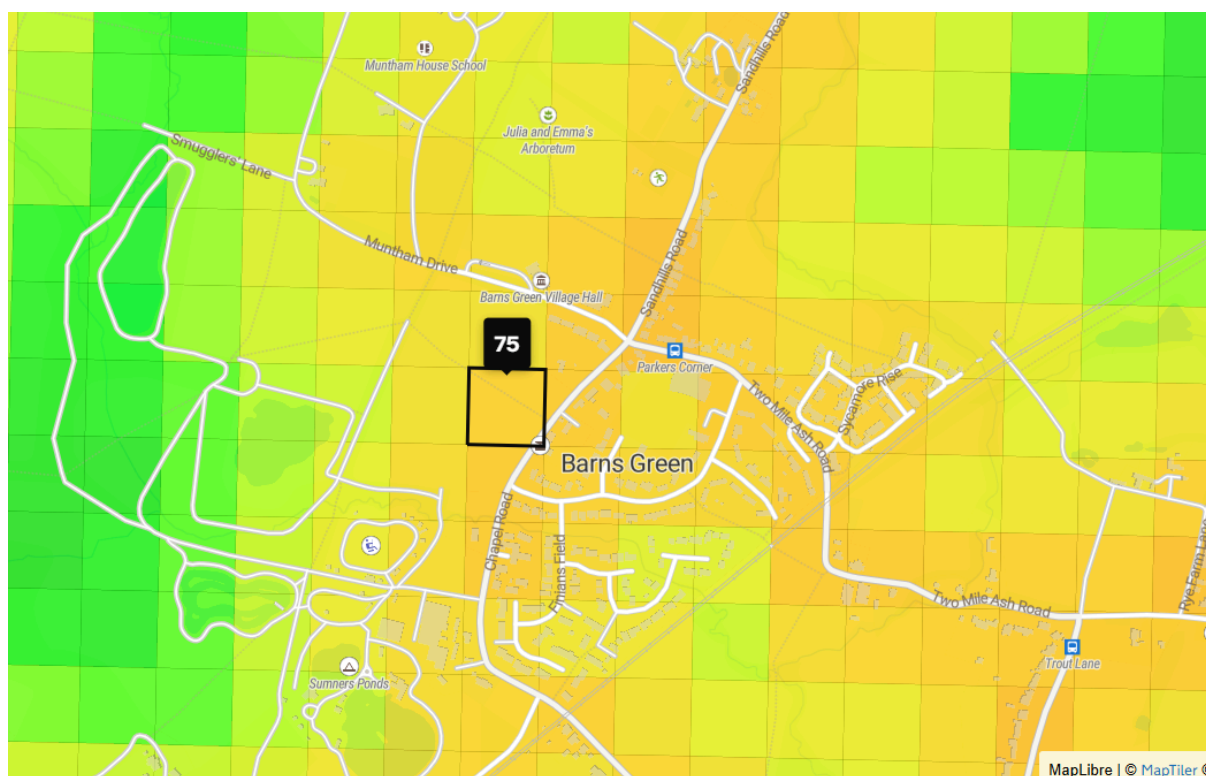


Figure 3.5: DfT Connectivity Tool – Driving

- 3.18 In contrast to the sustainable transport modes, the Site demonstrates relatively strong connectivity for car drivers, with a score of 75.
- 3.19 Given the relatively low levels of connectivity by sustainable modes and the comparatively high connectivity by car, it is reasonable to expect that the private car will remain the dominant mode of transport for most journey purposes.
- 3.20 This pattern is reflected in Census data for Barns Green, which is presented in the Applicant's Transport Statement and reproduced below.

Usual method of travel to work	2021
Bus, minibus or coach	1%
Train	8%
Driving a car or van	81%
Passenger in a car or van	4%
Bicycle	1%
On foot	5%

Table 3.1: Census data of usual method of travelling to work

- 3.21 The data indicates a high reliance on the private car for journeys to work with approximately 81% of residents driving a car or van to work, with a combined total of approximately 85% travelling by car when passengers are also included. This demonstrates that the private car remains the dominant mode of travel for commuting among residents.
- 3.22 After the private car, the next most common method of travel is train, accounting for 8% of journeys. To be clear, there is no railway station within Barns Green. Residents who identify that the train is their main mode of travel on a journey have to travel to Christ's Hospital railway station. In practice, most residents are likely to access the station by car because:
- the distance from Barns Green makes walking impractical; and
 - bus connectivity to the station is poor.
- 3.23 Consequently, it is likely that approximately 93% of journeys involve car use, comprising 89% as driver and 4% as passenger.
- 3.24 Despite the overall poor connectivity of the Site by sustainable transport modes, the Application proposes no changes or improvements to the existing sustainable transport offer.
- 3.25 In summary, the DfT Connectivity Tool demonstrates that the Site performs very poorly in terms of sustainable transport connectivity, with overall, walking and public transport scores placing it within the lowest 10% in England and Wales. While cycling connectivity performs slightly better, it remains below national averages and does not account for route quality or safety.
- 3.26 Conversely, the Site exhibits strong connectivity by private car, which is reflected in local Census data showing extremely high levels of car-based commuting. In the absence of meaningful improvements to sustainable transport infrastructure or services, the Proposed Development would be highly car-dependent, reinforcing existing travel patterns rather than supporting a meaningful shift towards sustainable modes.

4.0 HIGHWAY ACCESS

Proposed Highway Access

- 4.1 The Site benefits from a relatively long frontage to the public highway. Notwithstanding this, the proposed access has been positioned at a point where pedestrian and vehicle activity is likely to be greatest within the village. It is not clear why this location has been selected when other positions along the frontage may potentially have reduced conflict between highway users. It is possible that the drainage strategy for the Site has influenced the proposed layout and therefore the position of the access junction. However, irrespective of the underlying reason, the proposed access arrangement raises several highway safety and operational concerns.

- 4.2 These concerns primarily relate to the interaction between the proposed access, existing village facilities, on-street parking arrangements and the proposed highway alterations.
- 4.3 The proposed access is located immediately opposite the village shop, which is likely to represent the busiest point within the village in terms of pedestrian activity. The shop attracts regular footfall throughout the day, including short-stay visits where customers arrive by car and park nearby. Introducing a new priority junction at this location will result in vehicles turning into and out of the development at precisely the point where pedestrian movements are concentrated. When combined with vehicles manoeuvring into and out of parallel parking spaces in the vicinity of the shop, this creates a complex interaction between vehicles and pedestrians which increases the potential for highway safety conflicts.
- 4.4 The proposed access also results in the loss of existing on-street parking outside the village shop. The removal of these spaces may displace parking elsewhere along the street. In practice this may result in vehicles double-parking or parking on the opposite side of the road, with drivers and passengers then crossing the carriageway to access the shop. Such behaviour is typical in village environments where short-stay parking demand is associated with local services. This would introduce additional informal pedestrian crossings at a point already subject to increased vehicle turning movements, further exacerbating highway safety risks.
- 4.5 The applicant's drawings indicate that replacement on-street parking spaces can be provided to accommodate up to ten vehicles through parallel parking. However, the dimensions shown on the submitted plans appear unrealistic. The plans suggest that a 4.8 metre long vehicle could parallel park within a 5 metre long parking space, leaving only approximately 100mm clearance at either end of the vehicle within which to manoeuvre. In practical terms, such an arrangement would be extremely difficult for most drivers to utilise. Established highway design standards provide a minimum length of approximately 6 metres for parallel parking spaces, which has long been recognised as necessary to allow vehicles to manoeuvre safely and effectively into and out of a space. The spaces illustrated on the submitted drawings therefore appear to be significantly below accepted design standards and are unlikely to function as intended in practice.
- 4.6 The plans also show the provision of an H-bar road marking across the existing access for the shop, which is directly opposite the proposed site access. However, it should be noted that obstructing a vehicular crossover is already an offence under existing highway legislation. The purpose of an H-bar marking is therefore largely advisory, serving only to highlight the presence of an access. In practice, drivers who are prepared to park in a manner that obstructs a driveway are unlikely to be deterred solely by such a marking. Given that the development proposals remove existing on-street parking provision in the vicinity of the shop, the pressure for parking in the area may increase, which could in turn increase the likelihood of vehicles obstructing the access to the shop and potentially the proposed access. While enforcement mechanisms technically exist, in reality the practical ability of residents to secure enforcement is limited. If the intention is to ensure that the access remains unobstructed, more robust measures such as double yellow line restrictions would typically be required.

- 4.7 In addition, the location of the access appears to align directly with the access arrangements associated with the village shop. If the shop access is used, or could reasonably be used, by delivery vehicles then the proposed development access would effectively create a crossroads-type arrangement in the centre of the village. This would introduce additional turning movements in close proximity to each other, further increasing the complexity of vehicle interactions within a constrained highway environment.
- 4.8 The highway drawings also indicate the introduction of a carriageway build-out adjacent to the Queens Head public house together with hatched carriageway markings extending across the frontage of the building. These measures appear likely to affect the operation of the existing parking area and access arrangements serving the pub. The application documents do not appear to provide any detailed assessment of the operational implications for the pub, including the ability for delivery vehicles to safely access and manoeuvre within the frontage area. For example, it is not clear whether larger service vehicles such as a brewery delivery vehicle ("brewers' dray") would still be able to pull in, unload and depart safely if required. Even if deliveries currently take place elsewhere, there is nothing preventing the frontage being used for deliveries at some point in the future, and therefore the design should reasonably account for this possibility.
- 4.9 When the access arrangements associated with the public house are considered alongside those associated with the village shop, it again highlights that the proposed development access appears to have been located at the point where the greatest concentration of vehicle movements and pedestrian activity is likely to occur. This increases the potential for conflicting movements between vehicles entering and leaving the development, vehicles accessing nearby premises, on-street parking manoeuvres and pedestrian movements between the shop, the pub and surrounding residential areas.
- 4.10 The proposals also include highway widening intended to enable two-way traffic to pass while retaining a row of parked vehicles along the carriageway. This raises several additional concerns. Firstly, the widening of the carriageway risks introducing a more urbanised highway character within what is currently a rural village environment. Secondly, wider carriageways tend to encourage higher vehicle speeds. In this case, higher speeds would occur in precisely the location where the greatest number of turning movements, parking manoeuvres and pedestrian crossings are expected. Thirdly, increased carriageway width may inadvertently facilitate double-parking, which could further obstruct visibility and movement along the road.
- 4.11 Furthermore, the design introduces a series of approximately 4.8 metre wide carriageway build-outs intended to facilitate pedestrian crossing points. While the intention may be to assist pedestrians, such build-outs can also create sudden carriageway narrowing points which increase the potential for vehicle conflict. Cyclists may be required to move laterally into the carriageway in order to negotiate these features, placing them directly within the path of following vehicles. In addition, the combination of formalised on-street parking and build-outs may restrict intervisibility between pedestrians and approaching vehicles. Pedestrians standing at the crossing point may have their visibility obscured by parked vehicles, while approaching drivers travelling at up to 30mph along the widened carriageway may have limited opportunity to identify crossing pedestrians until the last moment.

- 4.12 Taking the above matters together, the proposed access and associated highway alterations introduce a series of unnecessary and avoidable highway safety concerns within what is currently a relatively simple village street environment. The access has been positioned at the point where pedestrian activity and local vehicle movements are likely to be greatest, immediately adjacent to the village shop and in close proximity to the Queens Head public house. This results in the concentration of multiple potentially conflicting movements within a limited section of highway, including vehicles entering and leaving the development, vehicles manoeuvring into and out of on-street parking spaces, delivery vehicles serving local premises and pedestrians crossing the road to access village facilities.
- 4.13 In addition to the location of the access itself, the supporting highway proposals raise further operational concerns. These include the loss and displacement of existing on-street parking outside the village shop, the provision of parallel parking spaces that appear to fall significantly below accepted design standards for practical use, and the reliance on advisory H-bar markings that are unlikely to prevent access obstruction in practice. The proposals also introduce carriageway widening which may encourage higher vehicle speeds in a location where pedestrian activity is concentrated, together with a series of build-outs that may create sudden carriageway narrowing points and potential visibility constraints due to adjacent on-street parking.
- 4.14 The proposals have the effect of introducing additional vehicle turning movements, parking manoeuvres and pedestrian crossings at precisely the point where the greatest level of activity already occurs within the village. Rather than simplifying the highway environment or improving safety for vulnerable road users, the scheme risks creating a more complex and potentially hazardous arrangement.
- 4.15 As such, the proposals do not demonstrate that safe and suitable access can be achieved for all highway users.

Permitted Development

- 4.16 The analysis and conclusions set out above are based on the existing highway layout, traffic conditions, and current patterns of use within Chapel Road. That assessment demonstrates that, even under the present street arrangement, the proposed access would fail to provide a safe and suitable means of access for all highway users, including motorists, pedestrians, cyclists, and users of the village shop. The proposal would therefore give rise to unacceptable highway safety and operational concerns.
- 4.17 These concerns are further reinforced when consideration is given to Planning Application ref. DC/19/2052 ("Herons Reach Permitted Development"), which benefits from planning permission and includes the following elements:
- Demolition of the existing village shop;
 - Restoration and refurbishment of the listed Herons Reach building;
 - Erection of a replacement standalone shop building with residential accommodation above;
 - Erection of a new residential dwelling; and

- Formation of a new vehicular access onto Chapel Road.

- 4.18 A plan illustrating the Herons Reach Permitted Development is included at [Appendix A](#). The approved scheme shows the existing village shop being demolished and replaced with a new standalone building positioned to the south of its current location. Importantly, the approved layout also introduces a new vehicular access between the listed Herons Reach building and the proposed replacement shop building.
- 4.19 It is immediately apparent from the approved layout that the Applicant's proposed access would be positioned directly opposite both the replacement village shop and the approved vehicular access associated with the Herons Reach Permitted Development. This materially alters the highway context from that assessed by the Applicant. As a consequence, the Applicant's proposed on-street parking arrangements and the limited highway mitigation measures advanced in support of the proposal would become impracticable and incapable of implementation. The street layout and traffic movements anticipated under the permitted development are fundamentally different from those assumed within the Applicant's assessment.
- 4.20 Furthermore, the highway safety concerns identified earlier in this report would be significantly exacerbated once the Herons Reach Permitted Development is implemented. At present, the village shop lies immediately to the north of the proposed access point; however, under the approved scheme, the replacement shop and associated customer activity would be located directly opposite the proposed access. This would intensify vehicular conflict, turning movements, driver distraction, and pedestrian activity at precisely the point where vehicles would be entering and leaving the Application Site.
- 4.21 The introduction of a new highway access in this location would also undermine the established role and function of the village shop as a focal point for the local community. The proposal would concentrate additional vehicular movements immediately outside the shop frontage, to the detriment of pedestrian safety, the convenience of customers, and the overall character of the village centre environment.
- 4.22 Vehicles are likely to continue parking informally on-street outside the shop, as occurs at present, resulting in additional obstruction, reduced visibility, and increased conflict between parked vehicles and traffic entering or exiting the proposed access. Such conditions would materially increase highway safety risks for all road users.
- 4.23 The only realistic means of preventing such parking activity would be the introduction of formal parking restrictions or traffic regulation orders along this section of Chapel Road. However, the imposition of such controls would likely have a severe adverse effect on the viability and functionality of the village shop, which relies heavily upon convenient short-stay parking and passing trade generated by local residents and visitors. The proposal therefore presents an inherent and unresolved conflict between highway safety objectives and the continued vitality of an important local community facility.

Planned Development

- 4.24 The Proposed Development forms part of allocation Policy HA6 within Horsham District Council's (HDC) Regulation 19 Submission Local Plan (LP19), which is currently undergoing Examination in Public. Whilst LP19 has not yet been formally adopted and therefore carries limited statutory weight at this stage, it nonetheless represents the Council's emerging spatial strategy and clearly indicates the authority's intended direction of travel in relation to future housing growth and site allocations within the district.
- 4.25 Policy HA6 identifies the following site allocations within Barns Green and Itchingfield:
- BGR1: Land south of Smugglers Lane (50 dwellings);
 - BGR2: Land south of Muntham Drive (25 dwellings);
 - BGR3: Land at the Old School Site, Itchingfield (20 dwellings).
- 4.26 In practice, allocations BGR1 and BGR2 effectively form a single, interrelated development area, separated only by Smugglers Lane. Notwithstanding this clear spatial relationship, no consideration appears to have been given to how the Proposed Development, which broadly corresponds with allocation BGR1, would integrate with the future delivery of BGR2. In particular, there has been limited assessment of the cumulative impacts arising from multiple access arrangements operating within the same constrained local highway environment.
- 4.27 Given the physical and operational constraints associated with Muntham Drive, including its limited width, semi-rural character, and restricted ability to accommodate significant additional vehicular movements, it is highly likely that any future development of BGR2 would need to secure vehicular access from Chapel Lane, potentially at a point just north of the proposed access serving the Proposed Development. The prospect of two closely spaced access junctions on Chapel Lane raises substantive concerns in respect of highway safety, vehicle conflict, driver visibility, pedestrian safety, and the overall efficiency of traffic movements along this section of the local road network.
- 4.28 Furthermore, the submitted assessment appears to consider the Proposed Development in relative isolation, rather than as part of the wider cumulative pattern of growth envisaged through Policy HA6. This approach risks underestimating the combined impacts of allocated development on Chapel Lane and the surrounding highway network, particularly during peak traffic periods. The cumulative effects of additional turning movements, increased traffic generation, and potential interaction between adjacent access points could materially exacerbate existing operational and safety concerns.
- 4.29 In the absence of a coordinated access strategy or comprehensive cumulative transport assessment encompassing both BGR1 and BGR2, it cannot presently be concluded that the proposed access arrangements would operate safely or efficiently over the lifetime of the development. A more holistic masterplanning approach is therefore required to demonstrate how the allocations identified within Policy HA6 can be delivered in an integrated manner without resulting in unacceptable impacts on highway safety or network capacity.

Alternative Highway Access Arrangements

- 4.30 Having regard to the concerns identified in the preceding section regarding the location of the proposed access and the concentration of pedestrian and vehicle movements in the vicinity of the village shop and the Queens Head public house, it is considered that a more holistic approach to highway design within this part of the village may be more appropriate.
- 4.31 In particular, there may be merit in introducing a 20mph speed environment along the section of road that passes the village shop and the pub. This would better reflect the character of this part of the village as a local activity area where pedestrians, parked vehicles and turning movements are concentrated. Lower vehicle speeds would also help to reduce the severity of potential conflicts between highway users and improve conditions for vulnerable road users such as pedestrians and cyclists.
- 4.32 It is suggested that such a 20mph section could extend from the junction with Hordens Road, continuing northwards to a point just beyond the junction with Muntham Drive. This would ensure that the reduced speed environment covers the entire section of road where pedestrian activity and local vehicle movements are most concentrated.
- 4.33 At the southern end of this section, the junction with Hordens Road could be redesigned in order to both reduce vehicle speeds and provide access to the Proposed Development site in a safer and more integrated manner. For example, the junction could potentially take the form of either:
- a mini-roundabout, which would naturally moderate vehicle speeds while allowing all turning movements to be accommodated safely; or
 - a raised table four-arm crossroads, which would further emphasise the pedestrian-priority nature of the location while also assisting in reducing vehicle speeds.
- 4.34 Either of these arrangements could provide a more coherent and safer point of access to the development compared with the currently proposed priority access located directly opposite the village shop.
- 4.35 Within the proposed 20mph section, additional traffic calming features could be introduced to reinforce the lower speed environment and ensure driver compliance. Such measures might include raised tables at key crossing points, carriageway narrowing features, or other forms of physical traffic calming designed to encourage consistently low vehicle speeds.
- 4.36 Pedestrian crossing opportunities could be incorporated into this design approach. For example, pedestrians could be provided with a crossing facility at or close to the Hordens Road junction, particularly if a raised table or similar feature were introduced as part of the junction redesign. This would create a natural crossing point within a low-speed environment.
- 4.37 An example of how this could look, having regard to and incorporating the new access arrangement for planning permission DC/19/2052, is provided at [Appendix B](#). For information the Applicant's proposed

means of access is included on the plan to demonstrate how incongruous the scale of it would be in a local village centre and in particular located directly opposite the permitted access for planning permission and the new location of the village shop.

- 4.38 Overall, this type of approach would move away from the introduction of a single new access junction at a location of existing high activity and instead seek to create a coherent low-speed village street environment that better reflects the presence of local services, pedestrian activity and on-street parking. Importantly it recognises and responds to the permitted relocation and reconfiguration of the village store and access. In doing so, it may provide a safer and more appropriate highway arrangement for all road users while accommodating access to the proposed development

Planning Implications

- 4.39 The alternative approach outlined above demonstrates that there are potentially more coherent and safer ways of accommodating development access within this part of the village while also addressing the wider highway environment. In particular, a comprehensive low-speed village street design centred around a 20mph environment, combined with appropriate junction treatment and pedestrian crossing facilities, could better reflect the character and function of this section of road where local services, pedestrian activity and on-street parking are concentrated.
- 4.40 In contrast, the applicant's proposals appear to have been developed primarily around the internal layout of the Site rather than the operation of the wider highway network. The result is the introduction of a new access junction directly opposite the village shop at the point where pedestrian activity, parking manoeuvres and local vehicle movements are likely to be greatest. This creates an unnecessary and unacceptable concentration of conflicting movements and introduces several highway safety and operational concerns, as set out above.
- 4.41 The fact that a more integrated and potentially safer highway arrangement could be achieved through a different design approach suggests that the current proposals have not fully explored reasonable alternatives. In planning terms, this raises questions as to whether the scheme has been designed in a manner that prioritises highway safety, supports the safe movement of pedestrians and cyclists, and responds appropriately to the character and function of the village street.
- 4.42 Accordingly, the current access proposals appear to represent a poor solution, driven by the constraints of the development layout rather than by a comprehensive assessment of how this section of highway should function. In the absence of a more considered design approach, there remain concerns that the proposed arrangements would introduce avoidable safety risks and fail to provide the most appropriate form of access to serve the development.

Highway Access Conclusion

- 4.43 In summary, the evidence indicates that the proposed highway access and associated mitigation measures fail to provide a safe, suitable and well-considered arrangement for all highway users. The proposal would introduce a significant concentration of conflicting vehicle movements, pedestrian

activity and parking manoeuvres at the busiest and most sensitive point within the village, immediately adjacent to key community facilities including the village shop and the Queens Head public house.

- 4.44 These concerns are further exacerbated by the approved Herons Reach Permitted Development, which materially changes the highway context and demonstrates that aspects of the Applicant's proposed mitigation would either become ineffective or incapable of implementation. In particular, the approved relocation of the village shop and associated access arrangements would intensify vehicle and pedestrian conflict directly opposite the proposed site access. The Applicant appears to have entirely ignored the Herons Reach Permitted Development.
- 4.45 The proposals appear to have been driven primarily by the internal layout constraints of the Site rather than by a comprehensive assessment of how this section of highway should function within the wider village environment. As a consequence, the scheme introduces avoidable highway safety and operational concerns within what is currently a relatively simple village street.
- 4.46 Importantly, alternative approaches exist which could provide a more coherent and appropriate solution. A comprehensive low-speed village street environment, incorporating a 20mph design approach, integrated junction treatment and improved pedestrian crossing opportunities, would better reflect the character and function of this part of the village while accommodating access to the development in a safer and more integrated manner.
- 4.47 In the absence of such an approach, the proposed access arrangements do not demonstrate that safe and suitable access can be achieved for all highway users and therefore give rise to significant concerns in relation to highway safety, village character and the operation of local community facilities.

5.0 COUNTY HIGHWAY AUTHORITY RESPONSE

- 5.1 The County Highway Authority (CHA) provided its consultation response to the Proposed Development on 30 January 2026 ("the CHA Response").
- 5.2 In considering the Proposed Development, it is important to note that the determining authority is Horsham District Council (HDC), not the CHA, which acts solely as a statutory consultee. It is for HDC to determine whether the Proposed Development constitutes sustainable development in transport terms and provides a safe and suitable means of access. In reaching its decision, HDC must have due regard to consultee responses, including those of the CHA, other interested parties, and, where relevant, its own independent transport advisors.
- 5.3 The CHA Response reaches a materially different conclusion to this report in respect of transport sustainability and highway safety. These matters are addressed in detail below.

Transport Sustainability

- 5.4 The DfT Connectivity Tool provides a publicly accessible, scores-based view of the Department's national connectivity metric. It indicates how well locations are connected to everyday destinations by walking, cycling and public transport, allowing an assessment of sustainable transport accessibility.

- 5.5 The importance of referring to the Connectivity Tool in planning for new development has already been emphasised in a ministerial statement dated 11 December 2025. The Secretary of State for Transport stated:

‘This landmark platform will serve as the new national metric of connectivity, transforming how we plan for new development and the transport infrastructure needed to support it, ensuring new homes and services can be easily accessed by sustainable modes of transport...’

- 5.6 In light of this statement, significant weight should be afforded to the Connectivity Tool by both policy-makers and decision-takers.
- 5.7 While the Connectivity Tool is referenced within the consultation draft National Planning Policy Framework (NPPF), it is a standalone assessment mechanism that has already been formally introduced. There is a clear expectation that it should inform both plan-making and decision-taking processes, irrespective of the draft status of the NPPF.
- 5.8 Neither the DfT nor the Secretary of State has prescribed a minimum connectivity score, thereby allowing decision-makers a degree of flexibility. However, having regard to paragraph 110 of the NPPF, which requires that developments provide a “genuine” choice of transport modes, it is difficult to conclude that a connectivity score of 31 — placing the Site within the lowest 10th percentile — meets this policy requirement.
- 5.9 Given the ministerial emphasis on the Connectivity Tool, and the fact that it has been available to local authorities since June 2025, it is notable that neither HDC nor the CHA has utilised it in assessing the Application Site. Instead, under the heading “Accessibility and Travel Plan”, the CHA relies on a qualitative assessment of transport provision, as set out below.

Public Transport

- 5.10 The CHA refers to bus services 64, 74, and 74A in support of its conclusion that the Application Site is sustainably located. The service frequencies, as presented in the Applicant’s Transport Statement (TS), are summarised below.

Table 3.2: Local Bus Services

Service	Route	Monday	Tuesday	Wednesday	Thursday	Friday
Farm Close (Northbound)						
64	Loxwood - Horsham	11:21	-	-	11:21	-
74	Storrington - Horsham	-	09:59, 12:36, 14:04	-	-	-
74A	Houghton & Storrington – Horsham	07:00	07:00	07:00	07:00, 12:37, 14:05	07:00
Farm Close (Southbound)						
64	Horsham - Loxwood	13:43	-	-	13:43	-
74	Horsham – Storrington	-	10:40, 13:15, 14:45	-	-	-
74A	Horsham – Storrington & Houghton	16:57	16:57	16:57	10:40, 14:45, 16:57	16:57

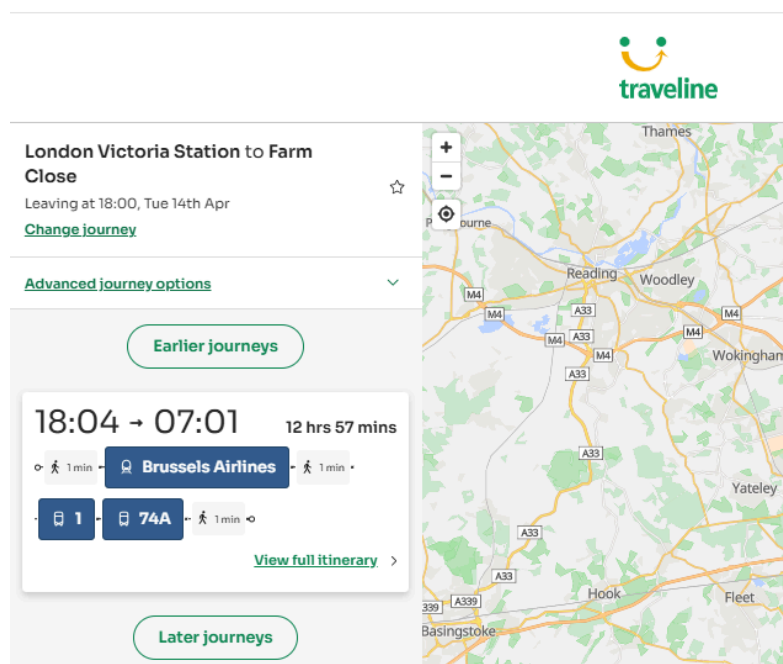
Source; Bustimes.org

5.11 As can be seen:

- the number 64 operates a single service in each direction on just two days per week;
- the number 74 operates three services in each direction on just a single day per week;
- the number 74A operates a single service per day in each direction on each week day, with the exception of Thursdays when there are three services in each direction per day.
- There are no weekday evening peak hour services;
- There are no Saturday services; and
- There are no Sunday services.

5.12 While national policy does not define the term “genuine” in the context of transport choice, it must reasonably imply a level of service that is practical and usable for everyday journeys. A service provision of one bus per day cannot reasonably be considered to constitute a genuine alternative to private car use. In this case, the extremely limited frequency renders the services otiose for typical commuting patterns.

- 5.13 The CHA asserts that “both rail stations” are accessible via these bus services, along with a range of onward destinations. However, this assertion fails to account for the severe limitations in service frequency, which render such journeys impractical in reality. Just one example is below of someone returning from London Victoria to the Application Site after a day in the office (assuming a 17:30 office finish and walking to the railway station):



- 5.14 The itinerary above demonstrates that a commuter leaving London Victoria at approximately 18:00, following a typical working day, would not be able to return to the Application Site until approximately 07:00 the following morning using these services.
- 5.15 This clearly demonstrates that travel to and from nearby railway stations by any mode other than the private car is not realistically achievable. While the CHA's statement may be technically correct in identifying a theoretical connection, it does not reflect a genuine or practical transport option.
- 5.16 This conclusion is reinforced by the Connectivity Tool, which assigns the Site a public transport score of 30. This places it firmly within the lowest 10th percentile nationally, confirming the very poor level of public transport accessibility.

Cycling

- 5.17 The CHA identifies a potential cycling catchment of up to 8 km, within which cycling may be considered a viable mode of travel. The Connectivity Tool similarly suggests that cycling could be the most favourable sustainable mode based on distance alone.
- 5.18 However, this assessment fails to consider the actual conditions on the surrounding highway network. The local roads are unlit and lack any form of dedicated or protected cycling infrastructure, and no such improvements are proposed as part of the development. In accordance with the Department for

Transport's Local Transport Note (LTN) 1/20, the absence of appropriate infrastructure and protection means that cycling would not be a realistic or attractive option for the majority of users.

Summary

- 5.19 In summary, the available evidence demonstrates that the Application Site performs poorly in terms of sustainable transport accessibility. The Connectivity Tool places the Site within the lowest decile nationally, while the limited and impractical public transport provision, together with the absence of suitable cycling infrastructure, fails to provide a genuine choice of transport modes. Accordingly, the CHA's conclusion that the Site is sustainably located is not supported by objective evidence or by the practical realities of travel behaviour.

Highway Access

- 5.20 The CHA Response is notably limited in scope, focusing almost exclusively on vehicular movements associated with cars entering and exiting the Application Site. There is no meaningful consideration of pedestrian activity, despite this being a fundamental component of highway safety and sustainable development. Similarly, there is no reference to placemaking principles or the need to create a safe, legible, and attractive environment for all users. This omission is significant, as national policy and guidance place increasing emphasis on designing streets as places rather than solely as corridors for vehicular movement.
- 5.21 Importantly and inexplicably, the CHA makes no reference to the Herons Reach Permitted Development and seem to be entirely unaware that this approved scheme will change the highway environment adjacent to the Applicant's proposed highway access.
- 5.22 Furthermore, the CHA has failed to identify a fundamental design flaw within the proposals: the parking spaces are insufficiently dimensioned to allow vehicles to manoeuvre into and out of them safely and conveniently. This raises practical usability concerns and introduces the potential for conflict, including obstruction of routes and unsafe reversing movements, which could adversely affect both pedestrians and other road users.
- 5.23 The CHA makes reference to a Stage 1 Road Safety Audit undertaken in accordance with GG119. However, the reliance on this standard is misplaced in the context of the issues identified. The concerns raised in this report relate not only to vehicular access but to the broader safety and usability of the development for pedestrians and cyclists. GG119 forms part of the Design Manual for Roads and Bridges (DMRB), which is primarily intended for the Strategic Road Network (SRN), such as motorways and trunk roads, and is not directly applicable to the design of local residential developments. Importantly, the auditor is only able to audit the drawings provided: which in this case entirely ignore the changes to the street environment arising from the Herons Reach Permitted Development. The RSA1 is therefore meaningless.
- 5.24 If an assessment aligned with DMRB were to be undertaken, the more relevant standard would be GG142, *"Walking, cycling and horse-riding assessment and review"*, which specifically addresses the

needs and safety of non-motorised users. However, even this would not represent best practice in the context of a development of this nature.

- 5.25 A more appropriate and proportionate approach would be the application of a Quality Audit, as set out in *Manual for Streets 2*. This framework adopts a holistic and context-sensitive approach, considering not only safety but also accessibility, urban design, and placemaking. It is specifically intended for local street environments and would provide a more balanced and policy-aligned assessment of the Proposed Development.
- 5.26 The CHA also notes that “the access and off-site highway works would be subject to a Section 278 Agreement with the Local Highway Authority and Technical Check.” While this may be procedurally correct from a highways perspective, it does not address the requirements of the planning system. The current application seeks full planning permission for the means of access, and it is therefore incumbent upon the decision-maker to be satisfied that the proposed access is safe and suitable at the point of determination.
- 5.27 Relying on a future Section 278 process to resolve fundamental design deficiencies is inappropriate, as this process sits outside the control of the planning authority. Accepting an indicative or substandard access arrangement on the basis that it may be improved at a later stage undermines the integrity of the planning process. It would be unreasonable to grant permission for a scheme that depends on subsequent redesign through a separate regulatory mechanism to achieve compliance.
- 5.28 In conclusion, 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.

6.0 SUMMARY AND CONCLUSION

Summary

- 6.1 This report has considered the transport planning context, sustainable transport connectivity, and proposed highway access arrangements for the Site, having regard to the National Planning Policy Framework (NPPF), the National Design Guide, and relevant guidance on walking, cycling, and sustainable travel.
- 6.2 The NPPF recognises that development should be directed to locations that are, or can be made, sustainable, with a genuine choice of transport modes. The inclusion of the term “genuine” highlights that the mere presence of sustainable transport options is insufficient; they must be sufficiently attractive, safe, and convenient to be realistically used. Furthermore, development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual

cumulative impacts on the road network would be severe, taking all reasonable future scenarios into account.

- 6.3 Analysis using the Department for Transport Connectivity Tool demonstrates that the Site performs poorly in terms of sustainable transport accessibility. The Site scores 31 for all sustainable modes, placing it within the lowest 10th percentile for connectivity. Walking and public transport connectivity are particularly low, while cycling is marginally stronger but still below national averages and unrepresentative of real-world route quality or safety. In contrast, the Site exhibits strong connectivity by private car (score 75), a pattern supported by Census data showing that approximately 93% of residents travel to work by car. This indicates that, without intervention, the Site would be highly car-dependent.
- 6.4 The proposed access arrangements exacerbate these concerns. Locating the access directly opposite the village shop and close to the Queens Head public house concentrates vehicle turning movements, pedestrian crossings, and on-street parking conflicts within a constrained section of the road. The proposals involve the loss of on-street parking, narrow and substandard parallel parking spaces, carriageway widening, and build-outs, all of which introduce additional potential conflicts, visibility constraints, and risk for pedestrians, cyclists, and other road users.
- 6.5 These concerns are further exacerbated by the approved Herons Reach Permitted Development, which materially changes the highway context and demonstrates that aspects of the Applicant's proposed mitigation would either become ineffective or incapable of implementation. In particular, the approved relocation of the village shop and associated access arrangements would intensify vehicle and pedestrian conflict directly opposite the proposed site access. The Applicant appears to have entirely ignored the Herons Reach Permitted Development.
- 6.6 In contrast, a more considered alternative could provide a coherent low-speed village street environment. Measures such as a 20mph speed limit, traffic-calmed junctions (mini-roundabout or raised table four-arm crossroads), formalised pedestrian crossing points, and appropriate traffic-calming features would reduce vehicle speeds, improve safety, and better reflect the function of the local street while maintaining access to the Site.
- 6.7 The current proposals appear driven primarily by the internal layout of the Site rather than a holistic assessment of highway function and safety. There is no evidence that reasonable alternative access arrangements, which could provide a safer and more integrated solution, have been fully considered.
- 6.8 The CHA Response, provided in January 2026, is a consultee submission and does not determine the application; that responsibility rests with Horsham District Council (HDC). While the CHA concludes that the Proposed Development is acceptable in transport and highway safety terms, this report reaches a fundamentally different view. In particular, the CHA has not made use of the Department for Transport's Connectivity Tool, despite clear ministerial support for its role as a national metric for assessing sustainable transport accessibility.
- 6.9 The evidence demonstrates that the Application Site performs very poorly in sustainability terms. The Connectivity Tool places the Site within the lowest 10th percentile nationally, and the public transport

provision is extremely limited, with infrequent and irregular bus services that are unsuitable for typical daily journeys, particularly commuting. Claims that nearby rail stations are accessible by bus are technically correct but practically unrealistic. Similarly, while cycling distances may appear reasonable, the absence of safe and suitable infrastructure means this is not a viable option for most users. Taken together, the Site does not provide a “genuine” choice of transport modes as required by national policy.

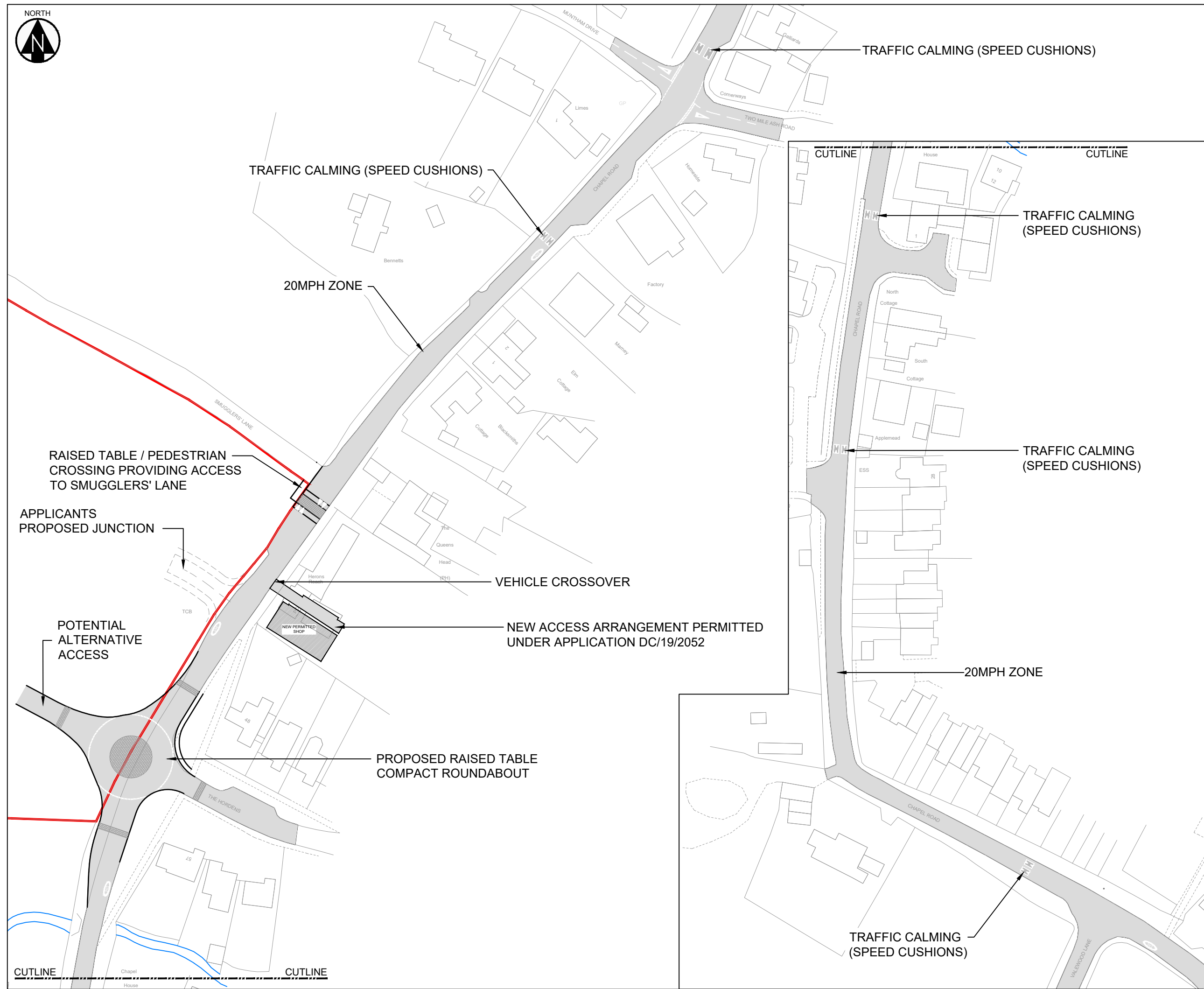
- 6.10 In respect of highway access, the CHA Response is narrowly focused on vehicle movements and fails to properly consider pedestrians, cyclists, or placemaking principles. It overlooks key design flaws, including inadequate parking layouts, and relies on inappropriate assessment standards more suited to strategic roads rather than local development. Inexplicably it also ignores the approved development and associated changes to the street environment immediately opposite the Proposed Development. Furthermore, the suggestion that deficiencies can be addressed through a future Section 278 process is not acceptable within the planning system. The proposed access must be demonstrated as safe and suitable at the point of determination, and on this basis, there is a clear and justified case for refusal.

Conclusion

- 6.11 The Site exhibits very low sustainable transport connectivity and would remain highly car-dependent. The proposed access arrangements introduce avoidable highway safety risks, concentrating conflicting vehicle and pedestrian movements at the busiest points within the village. A more considered design incorporating a 20mph environment, traffic calming, and formal pedestrian crossings would provide a safer, more appropriate solution.
- 6.12 It is therefore concluded that as submitted, the proposals do not provide safe and suitable access for all users and is inconsistent with the objectives of the NPPF to promote sustainable development and safeguard highway safety.

APPENDIX A – HERONS REACH PERMITTED DEVELOPMENT

APPENDIX B – ALTERNATIVE ACCESS ARRANGEMENT AND HIGHWAY MITIGATION



DO NOT SCALE.



SCALE - 1:1000

P3	20.05.26	Plan extended, additional detail added	RS
P2	25.03.26	Shading added	RS
P1	01.03.26	First issue	RS
Rev.	Date	Revision details	By



Client

Project

PROPOSED RESIDENTIAL DEVELOPMENT,
CHAPEL ROAD,
HORSHAM,
RH13 0PS

Drawing title

Proposed
Site Access & Highway Improvements

Drawing no.

CHA-P-01

Revision

P3

Status	Date	Issue Date
INFORMATION	01.03.26	01.03.26
Scale	Drawn by	Checked by
1:1000 @ A3	RS	JR