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TECHNICAL NOTE

PROJECT: Land East of Billingshurst Business Park (Phase 2) – Representation on behalf of Northgate Properties

REPORT: 2532/TN/01/C – Technical Note

DATE: April 2026

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1. This Technical Note is prepared by Highgate Transportation Ltd (HTp) on behalf of Northgate Properties with regard to the outline planning application (DC/25/1910) to Horsham District Council (HDC) for up to 125 residential dwellings and associated infrastructure/green space with all matters reserved apart from access on land east of Billingshurst Business Park (Phase 2) Stane Street, Billingshurst, West Sussex.

2. The need for the applicant under application DC/25/1910 to connect their internal footpath to Public Right of Way (PRoW) FP1942 and enable access for all pedestrians will be set out in this Technical Note, to enhance permeability including for future residents of the approved site DC/24/0749, rather than just providing access for the future residents of their application site.

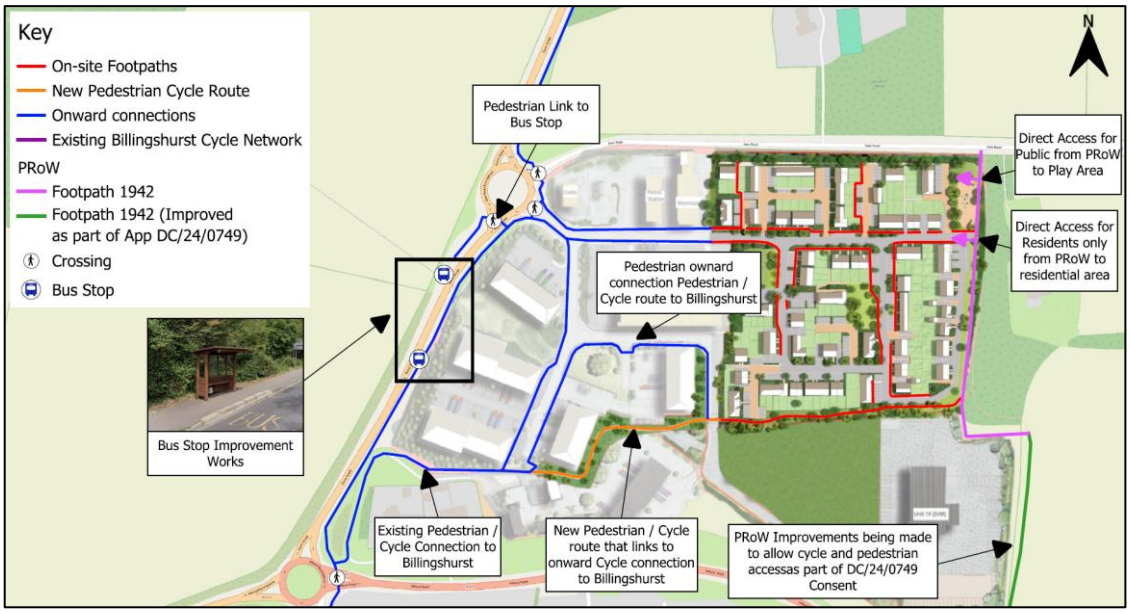
3. It will also be suggested that suitable surfacing along the section of FP1942 within the application site is provided to enable pedestrian access throughout the year, thereby ensuring the route is accessible for all, including wheelers e.g. pedestrians with pushchairs and wheelchair users. It is also considered that permissive rights for cycling should be given for the section of FP1942, which is within the land under the applicant's control, to allow cycle use.

4. This Technical Note will demonstrate how good masterplanning practice would dictate that footpaths, which connect separate parcels of development, should be uniform in their delivery, i.e. should provide access for pedestrians and cyclists via a 3.0 metre surfaced path which connects to the wider network.

5. PRoW FP1942 lies within the applicant's ownership, and therefore the applicant is in a position to carry out or contribute towards surfacing of the existing footpath, as well as provide permissive rights to cyclists, as has been carried out elsewhere within Billingshurst, including at the recently approved site DC/24/0749.

6. The application submission (DC/25/1910) includes a 'Pedestrian Accessibility Plan' demonstrating the existing and proposed pedestrian and cycle connections from the application site to the wider area. The plan is contained in **Appendix 1**, with an extract shown in **Figure 1**.

Figure 1 – Extract of Pedestrian Accessibility Plan



7. From **Figure 1**, it can be seen that in the north eastern corner there is an annotation stating, 'Direct Access for Residents only from PRoW to residential area'.

8. Comments have been received from the West Sussex County Council (WSCC) Highway officer stating that by providing a connection point to Public Right of Way (PRoW) footpath 1942 for residents only, and therefore restricting access for both the wider public and, in particular, residents under approved application DC/24/0749, is contrary to Paragraph 117(a) of the NPPF, which states *"give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use"*, with the highway officer requesting clarity as to why access is only being provided for residents of the application site.

9. It is considered by HTp that restricting the access to the development site from PRoW FP1942 is indeed contrary to NPPF paragraph 117 as it is restricting permeability and restricting neighbouring areas accessing high quality public transport, by a route which would minimise the travel distance for future residents.

10. Furthermore, it is not clear as to whether access to FP1942 for users of the existing Billingshurst Business Park, immediately west of their application site, will be restricted. It is also not clear how such access restrictions would be enforced.

11. An annotated extract of the site layout for planning application DC/24/0749 is provided in **Figure 2**, which shows where future residents could access PRoW 1942 to continue west to the bus stops on Stane Street.

Figure 2 – Annotated extract of site layout from approved application DC/24/0749

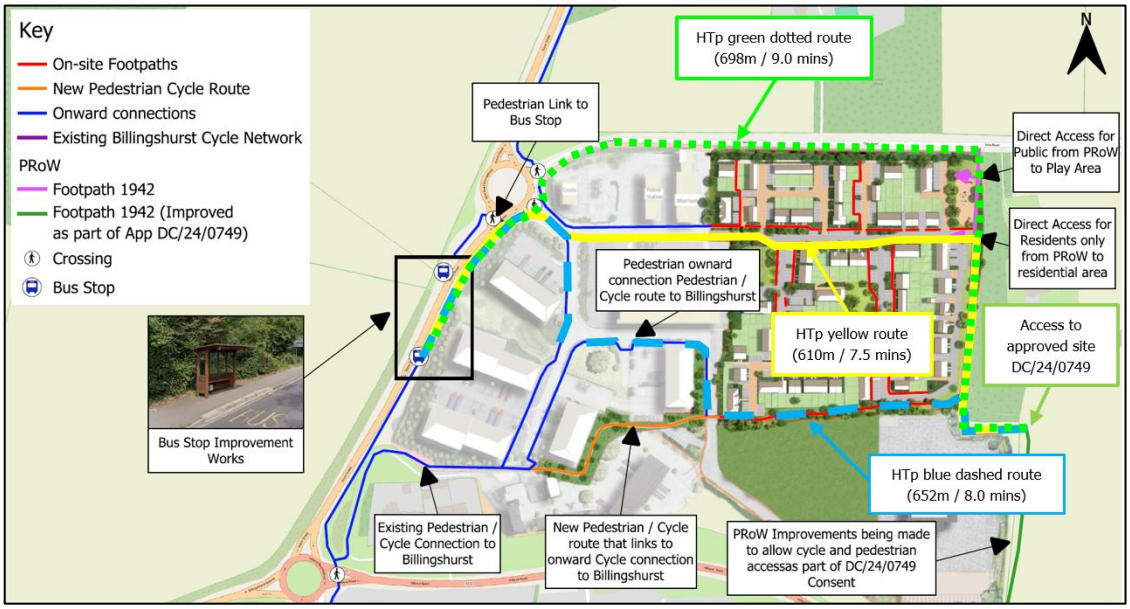


12. Pedestrians and wheelers (pedestrians with pushchairs and wheelchair users) from the approved site, as well as other residents on New Road, accessing PRoW FP1942 from the western boundary of the site would travel 610 metres to the bus stops on Stane Street through application site DC/25/1910 and Billingshurst Business Park; this is equivalent to around 7.5 minutes based on a walking speed of 80 metres a minute. The route is shown as yellow solid line on **Figure 3** below.

13. It is noted that there is an onsite footpath along the southern boundary of the application site (DC/25/1910) which connects into Billingshurst Business Park in which pedestrians can use the existing footways. For a pedestrian or wheeler (pedestrians with pushchairs and wheelchair users) to use this route, they would need to travel 652 metres to access the bus stops, which is equivalent to 8.0 minutes based on a walking speed of 80 metres a minute. The route is shown as a blue dashed line on **Figure 3** below. This route is therefore not as direct as via the path in the north eastern corner of the site, i.e. the yellow solid line.

14. Pedestrians and wheelers (pedestrians with pushchairs and wheelchair users) unable to access the application scheme, continuing north to the footway on New Road, which is provided under the approved application DC/24/0749, would travel 698 metres, which is equivalent to 9.0 minutes based on a walking speed of 80 metres a minute. The route is shown as a green dotted line on **Figure 3** below.

Figure 3 – Annotated extract of Pedestrian Accessibility Plan with walking routes



15. Therefore, by restricting residents from the approved site from utilising the proposed footways within the application site to access the bus stops on Stane Street, as well as the amenities in Billingshurst Business Park, the application site is contrary to paragraph 117 of the NPPF. It is considered that the northern access into the site should be open and accessible for all, not just future residents of the development, and that access for pedestrians and cyclists should be conditioned, with suggested condition wording at the end of this Technical Note. A s106 obligation may be required to allow passage through the estate along an agreed route.

16. Additionally, NPPF paragraph 115(b) states *"it should be ensured that safe and suitable access to the site can be achieved for all users"*. This wording implies that all users, including those not directly associated with an application site, should be able to achieve safe and suitable access to the site within reasonable circumstances.

17. Given that the residential development provides direct access to Billingshurst Business Park, and the existing amenities such as a Lidl, Morrisons, Costa, and Greggs, it is not considered unreasonable that access for those other than the residents of the application site be provided from FP1942.

18. It has therefore been demonstrated that the proposals under application DC/25/1910 do not accord with paragraphs 115 and 117 of the NPPF, and therefore planning application DC/25/1910 should not be permitted without safeguarding permeability for future pedestrians and wheelers, for both the residents of the development as well as the wider area, including from approved application DC/24/0749.

19. Furthermore, it is considered that the applicant should be required to contribute to or provide suitable surfacing along the section of FP1942 within the applicant's site boundary, and to provide a 3.0 metre wide path, to ensure that access is available for all throughout the year, ensuring that the proposals are in accordance with NPPF paragraph 115(b). It is also considered that permissive rights for cycling should be given along this section of FP1942, which is within land under the applicant's control to allow cycle use.

20. It is noted that the WSCC PRoW Officer provided comments dated 26th January 2026, subject to the requirement that FP1942 is resurfaced, recommending WSCC's Rural footpath specification with a no-dig zone. The Officer's comments also state that connection with the Hilland House site (DC/24/0749) is important, and that it is positive that there is onward connectivity for cyclists approaching from the south or east into the application's south-eastern corner. Clearly the PRoW Officer is of the opinion that continued connection should be made between the application site and the approved site (DC/24/0749), which is conducive to good masterplanning practice.

21. By surfacing FP1942 within the applicant's site boundary, this would enable connectivity and integration between the application site and the approved site (DC/24/0749) as well as the surfaced network of routes to the south of Hilland Road. Enabling good masterplanning between sites is in accordance with Active Travel England Guidance for Pavements and Footpaths recommending that footpaths should be direct, logical and intuitive to understand, and pavements and footways should link to other routes and facilities as part of a holistic, connected network.

22. It is considered that the surfacing of FP1942 should be a compacted limestone, i.e. WSCC's bridleway specification, to allow pedestrians and wheelers, as well as cyclists, to use the footpath throughout the year and connect to the wider network, including the surfaced paths provided within the approved site (DC/24/0749), as shown on the annotated plan contained in **Appendix 2**, as well as the surfaced section of FP1942 to the north and south of the A272 Hilland Road. It is further considered that the surfacing of FP1942 should be conditioned, with suggested condition wording at the end of this Technical Note.

23. Existing features along FP1942, such as stiles, could be removed, or replaced with suitable gates enabling access for cyclists and other wheelers to utilise the footpath and connect to the existing network of paths. This would ensure the development was in accordance with NPPF paragraph 115(b).

24. In addition to the NPPF, the restriction of access to the existing residents of New Road, as well as the wider public, and future residents of approved application DC/24/0749 is contrary to the following local policies:

    i. Policy 40 of Horsham District Planning Framework (November 2015)
    ii. Policy BILL 12: Protection and Enhancement of Key Movement Routes, Billingshurst Parish Neighbourhood Plan 2019-2031 (May 2021)

25. The two policies, including a summary as to why application DC/25/1910 does not accord with the policies is set out below.

Policy 40 of Horsham District Planning Framework

26. Policy 40 refers to Sustainable Transport. It is considered that the application site (DC/25/1910) does not accord with the following points of Policy 40, with how the application site does not accord with the policy in green:

There is commitment to developing an integrated community connected by a sustainable transport system. In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported.

Development will be supported if it:

3. Is integrated with the wider network of routes, including public rights of way and cycle paths

Although the proposals integrate with PRoW FP1942 enabling future residents to access the footpath, restricting access to users outside of the residential development does not provide integration for a wider network of routes, and therefore is not a holistic, connected network.

Furthermore, given that the network of PRoW within the vicinity of the site, to the south of Hilland Road has previously been upgraded to provide surfacing, and FP1942 within the recently approved site (DC/24/0749) will be upgraded to provide surfacing, it is considered that by not upgrading the surface of FP1942 within the applicant's boundary, the routes are not integrated and users of the footpath, particularly pedestrians with pushchairs and wheelchair users, will not be able to utilise the full PRoW network. As such, the development is therefore not in accordance with good masterplanning practice.

6. Minimises the distance people need to travel and minimises conflicts between traffic, cyclists and pedestrians.

If pedestrians who are using PRoW footpath 1942, either from the south, or from the approved residential application in the east are able to access application DC/25/1910, this would minimise the distance people need to travel to access the amenities within Billingshurst Business Park as well as the public transport bus stops on Stane Street, and would minimise the conflict between pedestrians and traffic. By restricting access to the wider public, this is contrary to the policy.

9. Provides safe and suitable access for all vehicles, pedestrians, cyclists, horses riders, public transport and the delivery of goods.

Restricting access for all pedestrians does not provide safe and suitable access for all users, particularly pedestrians with pushchairs and wheelchair users.

Furthermore, by not providing permissive rights for cyclists along the section of FP1942 within the applicant's boundary, access is prevented for cyclists who may have already travelled along the section of FP1942 that will have permissive cycle rights from within the approved application site DC/24/0749.

27. It has therefore been demonstrated that the proposals under application DC/25/1910 do not accord with Policy 40 of the Horsham District Planning Framework, and therefore planning application DC/25/1910 should not be permitted without safeguarding permeability for future pedestrians and wheelers, including cyclists, for both the residents of the development as well as the wider area, including those from approved application DC/24/0749.

28. Furthermore, it is strongly suggested that suitable surfacing is provided along the section of FP1942 within the applicant's site boundary, to provide a 3.0 metre wide path, to ensure that pedestrian and wheeler access is available for all throughout the year, particularly pedestrians with pushchairs and wheelchair users. It is also considered that permissive rights for cycling should be given for the section of FP1942, which is within the land under the applicant's control, to allow cycle use, and provide and continuous link from the section of FP1942 within the adjacent site DC/24/0749.

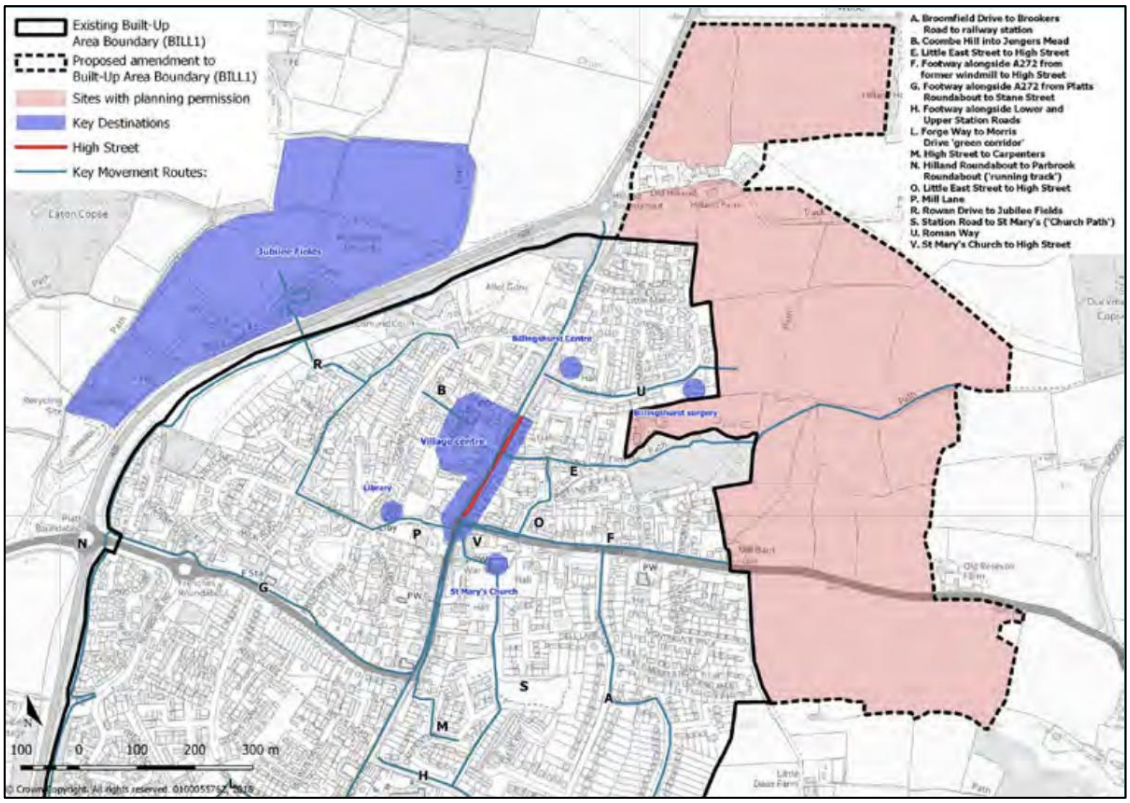
Policy BILL 12: Protection and Enhancement of Key Movement Routes, Billingshurst Parish Neighbourhood Plan 2019-2031 (May 2021)

29. It is considered that the application site (DC/25/1910) does not accord with the following points of Policy BILL 12 with how the application site (DC/25/1910) does not accord with the policy set out below:

> *B. As appropriate to their scale and nature, new development proposals should provide safe pedestrian and cycle access. Where it is practicable to do so, the pedestrian and cycle access provided should link up with existing footways and cycleways that, in turn, directly serve the Key Movement Routes shown on the Policies Map in Section 12.*

30. Policy BILL 12 B sets out that the pedestrian and cycle access provided should link up with existing footways and cycleways which directly connect to the Key Movement Routes shown on the Policies Map. An extract of the Key Movement Routes – north is provided in **Figure 4**.

Figure 4 – Extract of Key Movements Route - north



31. The existing PRoW 1942 connects into the footways to the south of A272 Hilland Road, which in turn connects to the Key Movement Route on Roman Way and the Key Movement Route along PRoW 1941.

32. By restricting access from FP1942 to the application site for wider users, this does not support Policy BILL 12 B, which states that new footpaths should connect to existing paths, which would indicate that the policy expects the routes to be utilised by more than just the occupants of the new development. By restricting access to the site from footpath 1942, pedestrians on the Key Movement Route along footpath 1941 would be restricted from accessing Billingshurst Business Park along the most direct route, meaning that pedestrians would not be provided with the most direct route.

33. Furthermore, given that permissive rights are given to cyclists within approved site DC/24/0749, and the applicants of this site are required to seek permissive cycle rights along the 75 metre long section of FP1942 to the south of the approved site (see **Appendix 2**), it is considered that by not providing permissive cycling rights along the section of FP1942 within the applicant's site, cyclists would be restricted from accessing Billingshurst Business Park. As such, cyclists would be required to take a longer route, on-road.

34. It is clear that a cycle route segregated from traffic in this location would not only provide shorter cycle times, but be likely to attract more cycling trips to access the facilities at Billingshurst Business Park, reducing trips made by the private car, in line with current local and national policy.

35. It has therefore been demonstrated that the proposals under application DC/25/1910 do not accord with Policy BILL 12 of the Billingshurst Parish Neighbourhood Plan. As such, planning application DC/25/1910 should not be permitted without safeguarding permeability for future pedestrians and wheelers, including cyclists, for both the residents of the development as well as the wider area, including from approved application DC/24/0749.

36. The Billingshurst Neighbourhood Plan sets out that it intends to ensure that new development is integrated into and well connected to the local infrastructure network. By enabling pedestrians and wheelers, including cyclists, to access the application site from a surfaced FP1942, this provides an integrated site in line with good masterplanning practice.

Summary

37. In summary, HTp on behalf of Northgate Properties it is considered that to avoid conflicting with local and national policy, and in the interest of masterplanning to provide integration between sites for pedestrians and wheelers, including cyclists, planning application DC/25/1910 should not be permitted without safeguarding permeability for future pedestrians, for both the residents of the development as well as the wider area.

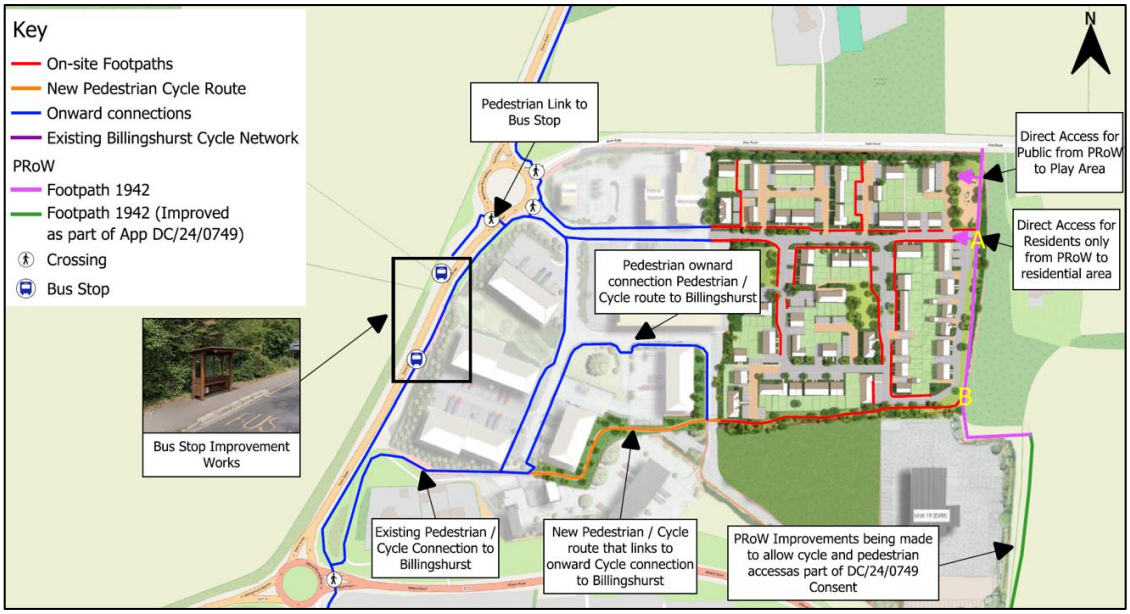
38. It is clear that if the officer is minded to recommend the application for approval this should be on the basis that a pre-commencement condition is included. This condition should obligate the development to connect to as well as contribute to, or provide suitable surfacing along the section of FP1942 to provide a 3.0 metre wide path within the applicant's site boundary to ensure that pedestrian access is available for all throughout the year. It is also considered that permissive rights for cycling should be given for the section of FP1942 which is within the land under the applicant's control to allow cycle use.

39. Suggested text for conditions is provided as follows:

"No part of the development shall commence until the section of PROW 1942 shown coloured pink on the Pedestrian Accessibility Plan has been re-surfaced to a width of 3m and to West Sussex County Council bridleway specification in accordance with a scheme of re-surfacing works to be submitted to and approved by the local planning authority in consultation with the local highway authority"

And

"No part of the development shall commence until permanent links between the development and PROW 1942 has been created at the points marked [A and B] on the Pedestrian Accessibility Plan to enable pedestrian and cycle access between the development and the public right of way and thereafter said links shall be retained and kept open for the lifetime of the development"



And (southern path/link option)

"No part of the development hereby permitted shall commence until:

1. *the pedestrian and cycle link along the southern boundary of the site shown coloured blue, orange and red on the Pedestrian Accessibility Plan (so as to enable passage on foot and by cycle between PROW 1942 and Stane Street) has been constructed in accordance with details approved by the local planning authority in consultation with the local highway authority and is open to use for pedestrians and cyclists; and*

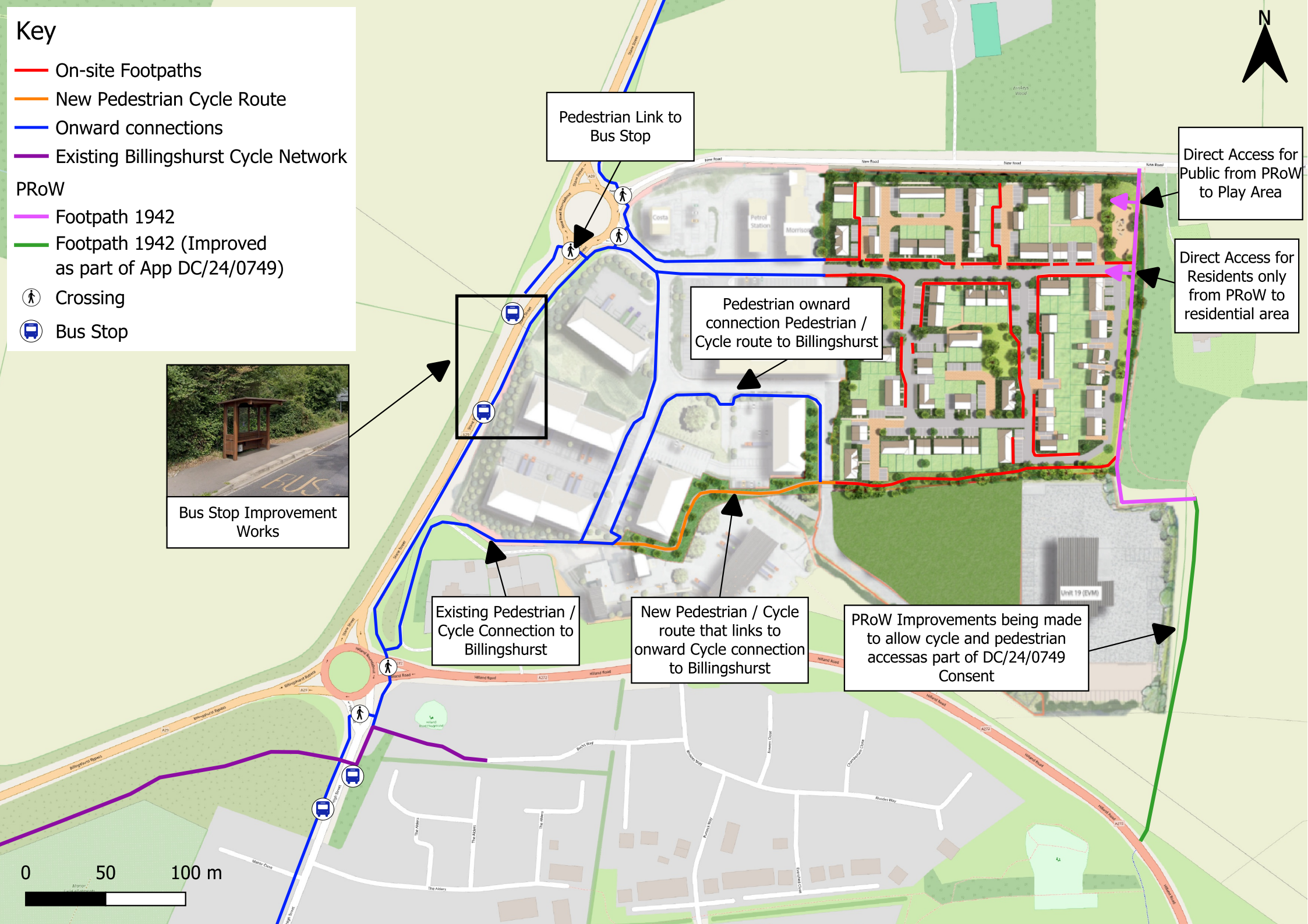
2. *the section of PROW 1942 shown coloured pink linking that pedestrian and cycle link to the section of PROW 1942 shown green on the Pedestrian and Accessibility Plan has been re-surfaced (and provided a form of gate or stile suitable for usage by pedestrians and cyclists) to a width of 3m in accordance with a scheme of works to be submitted to and agreed by the local planning authority in consultation with the local highway authority.*

Once completed and open for use, the pedestrian and cycle link referred to at (1) above shall be retained and made available for use by pedestrians and cyclists for the lifetime of the development or pending any permanent dedication of the link as highway for use by pedestrians and cyclists (whichever shall be the earlier)"

Appendix 1

Planning Application DC/25/1910

Pedestrian Accessibility Plan


Key
On-site Footpaths
New Pedestrian Cycle Route
Onward connections
Existing Billingshurst Cycle Network
PRoW
Footpath 1942
Footpath 1942 (Improved as part of App DC/24/0749)
Crossing
Bus Stop
N
Pedestrian Link to Bus Stop
Direct Access for Public from PRoW to Play Area
Direct Access for Residents only from PRoW to residential area
Pedestrian ownard connection Pedestrian / Cycle route to Billingshurst
Bus Stop Improvement Works
Existing Pedestrian / Cycle Connection to Billingshurst
New Pedestrian / Cycle route that links to onward Cycle connection to Billingshurst
PRoW Improvements being made to allow cycle and pedestrian accessas part of DC/24/0749 Consent
0
50
100 m

Appendix 2

Annotated Extract of Plan of Approved Site DC/24/0749


New Road/ Stane Street Roundabout
1.5m Highway Footpath
New Road
FP1942
Billingshurst Trade Park
DC/23/2103 (Live Application)
DC/21/0748 & DC/22/0566
FP1942 surfaced within approved site
Permissive Footpath
PROW 1942
Permissive rights to be sought for cyclists along 75 metre section of PRoW 1942