
Appendix A – WSCC Comments

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Matthew Porter
FROM:	WSCC – Highways Authority
DATE:	23 March 2026
LOCATION:	Land North West of Southwater
SUBJECT:	DC/26/0366 Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.
DATE OF SITE VISIT:	As part of pre-application discussions in October 2025
RECOMMENDATION:	More Information

1. Comments are made in respects of,

- ES Volume 2, Appendix 12.1: Transport Assessment, February 2026
- Design and Access Statement, February 2026
- Movement Parameter Plan, drawing number 0007, revision D
- Illustrative Masterplan (not for approval), drawing number 0015, revision G

2. WSCC Highways has been involved in on-going pre-application discussions with the Applicant. These discussions have focussed on the scope of the Transport Assessment (TA) and offsite highway improvements. Details of some of these discussions are set out in annexe A of the TA.

Policy Position

3. The site is not currently formally allocated for development within any adopted planning policy. It's recognised that the site has been included within the Horsham District Council Local Plan 2023-2040 Local Plan Reg 19 consultation and as such may be considered a preferred option.

4. There are a number of highway requirements within the site-specific policy within the draft Local Plan. These are,

A comprehensive transport strategy is submitted as part of the masterplan with development to include the following:

A walking and cycling strategy that demonstrates how attractive, direct and legible routes that have priority over motorised traffic, and integrated with the existing and wider network, will be delivered and maintained. It should take account of the West Sussex County Council schemes from their "Walking and Cycling Strategy (2016-2026)", including investigating direct and indirect walking and cycling routes connecting Horsham to Southwater.

b) Improved links shall be provided between the development and Christ's Hospital station to help promote sustainable travel. This will include: enhancements to the Downs Link.

subject to suitable access and strong landscaping being provided, a new link road connecting the development to Two Mile Ash Road, together with a new crossing to connect with Christ's Hospital Road. A new footway will also be provided along Station Road at Christ's Hospital to complete the route and deter on-verge parking associated with the station.

iii. a new car park and cycle storage at Christ's Hospital station.

iv. exploring the options with Metrobus to provide a direct service between the development and the station.

c) New road improvements shall be provided as part of the development, including:

a new link road between the development and Hop Oast roundabout.

full signalisation of the Hop Oast roundabout to allow safe crossing of pedestrians and cyclists north to Horsham, plus further improvements to junctions on the A24 in consultation with, and as required by West Sussex County Council.

iii. four new accesses to the development, in consultation with West Sussex County Council, in order to spread traffic evenly across the development.

iv. new walking and cycling routes within the site.

v. improvements between Cedar Drive roundabout and the new school.

vi. the provision of a sustainable link for pedestrians and cyclists between Southwater village and Horsham (a bridge, underpass, or signal-controlled toucan crossing close to Hop Oast roundabout), in consultation with, and as agreed by, West Sussex County Council.

5. In considering this current planning application, WSCC Highways has been mindful of the transport requirements included within the site-specific policy, albeit these presently are understood to ultimately have limited weight.
6. WSCC Highways have primarily assessed these proposals against the relevant paragraphs (namely 115, 116, 117 and 118) within the National Planning Policy Framework as well as respective design standards, guidance, and best practice.

Access

7. The Site Access Strategy is set out within section 5.2 of the TA with figure 5.1 showing the access locations. In summary, five vehicular accesses are proposed to serve the development site. Whilst more detailed comments are made in respect of these below, as a general point, WSCC Highways will require Stage One Road Safety Audits for all of these. This is acknowledged within the TA but is reiterated here.
8. Taking these in turn, the following comments would be offered.

Four Arm Roundabout on Worthing Road, southwest of A24 (access A1)

9. Details are shown on drawing number ending TP-0103 revision P02. The arrangement is shown as a standard 40 metre roundabout with an over-run area around the central island. As a matter of principle, WSCC Highways will require a design audit for this junction. The audit should set out in a tabular form with the following as headings, design standard applied, the requirement within the standard, and how the scheme complies or not.
10. Tracking for an HGV (both rigid and articulated) should be provided, particularly for the eastern to southern arm, and vice versa.
11. The two parallel crossings are also noted. These would operate as Zebra crossings where those crossing would exert a priority over vehicular traffic. In-principle, WSCC Highways doesn't consider this to be an appropriate context (i.e. potentially heavily trafficked with vehicles travelling from the A24) for this nature of crossing; this could present a very intimidating environment for pedestrians and cyclists to use especially so for the crossing on Worthing Road. WSCC Highways preference would be for a Toucan crossing instead. A Toucan crossing is suggested over a push button parallel crossing (a Sparrow crossing) given the anticipated crossing demands that wouldn't require different user groups to be segregated.
12. The Applicant may wish also to consider whether there is a need for segregation for pedestrians and cyclists on the approach to the crossing. In this situation, shared use may offer an acceptable arrangement and provide a more simpler highway arrangement leading into the crossing.

13. The Applicant should note that a buffer would be required between the carriageway and cycle route where the speed limit is 40mph.
14. As a final point, the contours on the drawing are noted with there being a clear need for land to be raised. Although exact longitudinal gradients may not be available at present, the Applicant should confirm in the design audit that forward visibility and gradients will comply with the necessary standards and guidance.

Priority Junction with Ghosted Right Turn Lane onto Worthing Road (access A2)

15. There are no in-principle issues with the arrangement shown on drawing ending TP-0101. Similar to the proposed roundabout, WSCC would request a design audit demonstrating the standards have been applied and how the scheme complies with these. Visibility splays compliant with the existing 40mph speed limit should also be demonstrated although there are references on drawings elsewhere to the speed limit being reduced to 30mph.
16. The right turn lane includes pedestrian refuges albeit it's not clear of the extent of the proposed footways on the western side of Worthing Road that these then tie into. The Applicant should clearly show the footway extents on this drawing (it is noted that these are indicated on a separate drawing (number ending TP-0107 revision P01)).
17. With regards to the footway on the eastern side of the carriageway, this should be extend northwards to provide a connection to the nearest bus stop to the north at Warnham Gate.

Realigned Chessall Avenue (Access A3)

18. Details are shown on drawing ending TP-100. The details show the realignment of Chessall Avenue to create a new link road to the east with the existing southerly alignment of Chessall Avenue then meeting this by way of a new priority junction.
19. The only comments are in respects of the arrangements for walking and cycling, and particularly the raised priority crossing feature. WSCC Highways fully endorse and support priority being given to pedestrians and cyclists at crossing points. However, the priority crossing proposed is an isolated feature with nothing similar in the immediate area. Also, the alignment of the cycle route (which would be a two-way route) to both the east and west would require a southbound driver turning into Chessall Avenue to almost be looking over their shoulder behind them to see any cyclist, which could easily result in collisions. Eastbound cyclists are also discharged back onto the carriageway a very short distance to the east.

20. The arrangement shown is not considered ideal. WSCC would ask the Applicant to investigate whether the cycle route could continue to Worthing Road/Chessall Avenue roundabout and then continued to the east with improved crossing facilities on Worthing Road before then rejoining the carriageway on Cedar Drive. This is suggested given the significant amount of residential development on Cedar Drive/east of Worthing Road, and the potential number of cycling trips that could be generated from here towards the proposed secondary school. If this isn't an option, it may be better for cyclists to rejoin the carriageway at the new priority Chessall Avenue junction.

Priority Junction onto Two Mile Ash Road (Access A4)

21. Details are shown on drawing ending TP-0102 revision P02. The access is shown as a simple priority junction. Traffic management features are shown to the north and south albeit the access is understood not to be reliant upon these features and the associated speed reducing effects. Further comments are made on the traffic management measures within the 'Access by Walking, Cycling, and Passenger Transport' section below. The Stage One Road Safety Audit will of course need to consider the operation of the access and traffic management features collectively.

22. The access itself is shown with 12 metre kerb radii. This results in a very significant and wide access. WSCC would prefer a more compact access arrangement with reduced kerb radii and overall width. In this situation, there would be no apparent issue should a large vehicle have to overhang the centre line on Two Mile Ash Road or the site access road when entering or exiting.

23. Visibility splays should be demonstrated although there are no apparent issues or constraints to visibility to either the north or south.

Left in, Left out access onto Worthing Road (Access A5)

24. Details are shown on drawing ending TP-104. The access is intended to serve only the gypsy and traveller plots. Given this, the access is expected to be very lightly trafficked.

25. The access is shown as having restricted movements (i.e left in and left out only) with there being roundabouts to the immediate north and south to provide the ability to turn. The principle of this arrangement is accepted.

26. The restricted movements will need to be supported by way of a Traffic Regulation Order to make these legally enforceable. The restriction on turning movements should also seek to be self-enforcing to prevent this from requiring any extensive policing. The Applicant should confirm the intentions

for the traffic island segregating in and out movements, and how this option will be self-enforcing.

27. Suitable visibility splays would need to be demonstrated to the southeast and towards the existing roundabout at the Worthing Road/Blakes Farm Road junction.

A24 Hop Oast Signalisation

28. Whilst not a new junction, the Applicant is proposing significant works to signalise and modify this existing roundabout. These works will also require a design audit and a Stage One Road Safety Audit once an in-principle agreement has been reached for the improvement scheme.

29. As per other signalised junctions on the A24 and A264 corridor, the Applicant will need to fund and implement the provision of a 50mph speed limit in association with the proposed signalisation.

30. The WSCC Traffic Signals team have undertaken an initial review of the proposed signalisation. The following comments should be addressed within the Design Audit,

- A copy of the LinSig model required, showing all lanes including the bus lane, for analysis.
- There are potential concerns as to whether a bus will be able to make the turn towards Southwater from the bus lane.
- Is there the demand for a Pegasus & equestrian track, particularly on a high-speed stretch of the A24. Southbound traffic has the potential to be travelling quickly which may offer a dangerous situation for any waiting horse/rider combinations.
- Full tracking is needed showing vehicles successfully negotiating all possible movements.
- The island on the gyratory is likely to need to be wider to achieve minimum clearances (450mm) for equipment that will need to be installed.
- Pole locations should be shown, to ensure suitable positioning can be achieved, including distances from stop lines for secondary signal heads.
- Where is the controller to be placed?
- A maintenance bay will be required close to the signal controller.
- Given the lack of footway, I am concerned at how maintenance access to all stop lines (where poles will be installed) can be safely achieved.
- Is it known how frequently a bus will use this roundabout, as this could cause significant delays if bus priority is installed; likely halting a significant proportion of traffic flows.

Access Strategy Summary

31. The various accesses are noted. WSCC Highways would not consider any of the arrangements to be fundamentally unacceptable although there are elements for several accesses that will need to be amended. Further information is required for all accesses in the form of a Stage One Road Safety Audit. Design Audits are also required for the proposed roundabout and ghosted right turn lane onto Worthing Road as well as the improvements at A24 Hop Oast Roundabout.

Vehicle Trip Generation and Highway Capacity

32. Matters relating to the assessment of highway impact have been agreed through pre-application discussions. In summary the following items have been agreed,

- Vehicle trip generation has been agreed for the proposed 1,000 residential units, 17,000sqm of employment space, secondary school, and specialist accommodation (80 bed extra care home),
- Trip rates for these uses are based upon similarly located sites taken from the TRICS database,
- The impact of increased vehicle trips has been considered for the AM and PM network peak periods, which are agreed as the most sensitive to change,
- Vehicle trips for the residential uses have been broken down by journey purpose with these then proportionately distributed to potential destinations,
- Vehicle trips have been distributed using the Horsham Transport Study Model (HTSM),
- The impact without (do-minimum) and with (do-something) development traffic has been considered for a future year of 2036
- The future year with development scenario includes a 10% reduction for external vehicle trips in light of the transport vision.
- A study area has then been agreed based upon the distribution of vehicle trips.

33. Related to the bullet points above, it is accepted that whilst there is a total employment floorspace give, the specific breakdown of uses within this are to remain flexible. The assumptions applied within the modelling use a high percentage of 'business park', which is a high peak hour trip generator compared with 'industrial estate' and 'parcel delivery' (the other employment uses included in the assessment). The assumption applied is considered fair and not under or over estimating trip generation from these uses.

34. It should also be noted that a small degree of internalisation has also been agreed for the employment uses. This is to account for the potential for residents (both within the development and in Southwater) to work within

the proposed employment uses or those in the local area, and that who may then travel by walking and cycling rather than by car.

35. With the residential trips, these have been broken down by journey purpose. For trips that are anticipated to stay within the immediate local area, these are assumed to take place by walking or cycling. The overall vehicle trip generation for these purposes has then consequently been reduced in light of these trips taking place on foot or cycle.
36. It's recognised also that presently all secondary school-based trips will travel beyond Southwater. The presence of the proposed secondary school will assist in redistributing a potential significant number of these trips to the new site where walking and cycling is a real possibility.
37. The TA appears to be silent on trip generation associated with the community uses, primary school, nursery, and gypsy and traveller pitches. In reviewing these uses, WSCC accept that some of these are low traffic generators (gypsy and traveller plots), will be ancillary to the overall development (community uses including any retail proposed), will provide new destinations for trips already taking place (the primary school and nursery), or will generate mostly internalised trips that do not affect the wider highway network (the school, nursery, and community uses). Notwithstanding the absence of references in the TA, the inclusion of these uses in the assessment would make little difference to the overall conclusions.
38. The application of a 'transport vision' accords with the requirements of the National Planning Policy Framework. The purpose of a 'vision' is to identify measures and interventions to specifically influence how residents choose to travel. The proposed vision is very much based upon improved accessibility and providing for localised trips. The vision also focuses upon the use of public transport for external trips. WSCC support the proposed vision in principle although it's considered that more could be done to achieve specific connections between the site and the local area. This is considered in greater detail within the 'Access by Walking, Cycling, and Passenger Transport' section.
39. The vision itself seeks to achieve a 10% reduction in external car-based trips. This is considered modest in light of the bus service frequency that will be achieved from funding associated with this development and that at Horsham Golf (DC/23/1178). WSCC also acknowledge that the Applicant is discounting external car trips where these are being assigned by journey purpose and destination. As such, it may be interpreted that a further vision-based trip reduction is being achieved through this discounting too.

40. The Applicant should note that a key part of the vision approach is to monitor the vision to ensure it is being achieved. A monitoring strategy would be required in these respects. This should include additional measures that can be implemented should external vehicle trip generation be greater than anticipated. The additional measures should be proportionate to the level by which the target mode shares are being missed.

Modelling Outputs and Specific Junction Assessments

41. The modelling process identifies several junctions where the development is anticipated to have a notable impact. The TA further assesses these locations using industry accepted capacity modelling programmes. WSCC accept that for the majority of junctions, the development will have little impact with these continuing to operate with minimal queues or delays. The model outputs also indicate that the development will generate very little additional traffic through Southwater itself. There are locations where WSCC would wish to comment further.
42. Section 9.3 and in particular figures 9-2 through to 9-5, show the outputs from the HTSM and those routes that are expected to see an increase in vehicle movements. The notable aspect are the increases on Two Mile Ash Road and Christs Hospital Road that are stemming from the proposed access onto Two Mile Ash Road. In highway capacity terms, the increases are not necessarily significant (i.e. the increases aren't such that significant levels of queues and delays will result) but there is still an increase nonetheless. It would also be highlighted that there aren't any base flows without development to put the development traffic increases into context.
43. The Applicant should also confirm whether any modelling outputs are available indicating whether other existing traffic is expected to redistribute as a direct result of the formation of the Two Mile Ash Road junction; the model outputs show only development traffic.
44. With regards to traffic using Two Mile Ash Road (and thereafter Tower Hill) to reach Horsham, WSCC accept that the modelling may be overestimating this and that may not be fully accounting for the benefits arising from the signalisation of the A24 Hop Oast Roundabout and the traffic management works also proposed by the Applicant on Two Mile Ash Road. The signalisation of Hop Oast will (based on the detailed modelling) result in very minimal queues and delays on the east and west Worthing Road arms with the B2237 providing a more direct route into Horsham.
45. The exact purpose of the access onto Two Mile Ash Road aside (the development would in no way seemingly require or be reliant upon this albeit it is included in the draft policy wording), the route within the development to this should be designed to discourage vehicular traffic. This requirement

should be included within any overarching Design Code and these comments are repeated again within the 'On-Site Design Principles' section.

46. As noted, the development is also proposing to signalise the A24 Hop Oast Roundabout. The signalisation is required to mitigate the capacity issues forecast on the A24 arms that are worsened with the inclusion of the development. The signalisation is offering much wider benefits beyond improving capacity in terms of controlled crossing provision for all non-motorised road users on the A24 southern arm.

47. The signalisation also offers bus priority measures at Hop Oast. WSCC supports the inclusion of bus priority measures where appropriate and where these offer a real benefit. However, the layout presented included bus priority on the westbound movement from the B2237 Worthing Road into Southwater only. Whilst the arrangement presented includes a bus lane on the B2237 arm, based on current best practice, the layout of the traffic signals on the B2237 arm would mean that all traffic would operate on the same phase; the arrangement would not allow for a separate phase for buses. It's only within the internal circulation of the roundabout that a separate bus phase would be possible. The presence of this separate phase would impact upon other circulatory phases and the overall junction capacity. Given this, WSCC would then question whether the bus priority would offer any betterment in this instance or whether it would be better to omit these works in light of a better all-round junction performance. WSCC would ask for an alternate scenario to be presented that excludes the bus only lane for comparison.

Highway Capacity Summary

48. The methodology of the highway assessment has been discussed and agreed through pre-application discussions. There are aspects within the modelling outputs that would require further discussion and potential alteration.

Access by Walking, Cycling, and Passenger Transport

49. Broadly, there are two elements to the assessment for walking and cycling within the TA. Firstly, an assessment of potential destinations within reasonable walking and cycling distance using those distances quoted within good practice guidance. Secondly, a more detailed assessment of routes that may be used and where appropriate the identification of potential improvements.

Walking

50. Taking walking, 4.2.2 of the TA references various guidance documents to determine upper walking distances. It's noted that PPG13 is quoted despite this being withdrawn in 2012. The assessment itself is based upon the distances within the CIHT 'Providing for Journeys on Foot' document. This

document (which was published in 2000) has not been withdrawn but there is more recent evidence (from the National Travel Survey (which is referred to in relation to cycling)) that generally indicates the majority of walking trips are approximately 1 mile or 1.6 kms. The distances within the NTS are considered more relevant although these are not viewed as an absolute upper limit.

51. WSCC also recognises that the linear nature of the site will significantly influence walking times and distances depending on the journey starting point. It is acknowledged that the TA methodology uses a central point, which is a standard approach.
52. For the purposes of considering walking distances, Lintott Square, which contains the majority of day-to-day services in Southwater, is within reasonable distance. All of the services proposed in the site are also within reasonable walking distance. The greater consideration is more the suitability of existing and proposed routes to accommodate the demands associated with the development.
53. An assessment of walking routes is included within annexe E of the TA. The assessments are useful and are based upon an appropriate framework. The outputs from the assessment are somewhat subjective in places and in other places potentially incorrect (e.g. the assessment refers to adequate dropped kerbs and tactile paving on Blakes Farm Road although there is a notable absence of tactile paving and dropped kerbs at some junctions). Some of the locations assessed are in any case a significant distance away from the development, and it would be unreasonable to expect the development to remedy existing issues.

Cycling

54. For cycling, the distances used within the assessment are agreed. It's acknowledged that the range of services within cycle-able distance is significant. However as also demonstrated in the TA, there is very limited cycle specific infrastructure in the local area and the nature of some of the routes both within Southwater and beyond the urban area (with respects to the absence of segregated facilities, traffic speeds and flows) will be a barrier to some users.
55. WSCC accept that the majority of routes within and beyond Southwater are constrained, limiting the measures that can be introduced. Where improvement schemes are identified (which are indicated below), these primarily seek to lower traffic speeds to make on-carriageway cycling more attractive for a wider range of users. There are however still sections on improved routes where further works are not possible. This in turn may continue to dissuade cycling by some.

56. Whilst improvements within and beyond the existing urban area of Southwater are limited, it is within the gift of the Applicant to provide cycle routes within the development itself. The linear nature would lend itself to provide an alternate route to using Worthing Road with the Movement Parameter Plan indicating a segregated cycle route along the western side of the proposed spine road from the proposed northern roundabout through to the existing Worthing Road/Chessall Avenue roundabout. It'll then be possible for cyclists to continue southwards albeit on-carriageway to Lintot Square using Chessall Avenue, and Kensett Avenue (both of which are lightly trafficked compared with Worthing Road) before joining Downs Link which then links into Lintot Square. This will be a reasonably direct route making use of off-carriageway facilities or lightly trafficked roads. This route should be usable by the significant majority of residents.

57. Beyond this link to the south and that to the north to the A24 Hop Oast Roundabout, the Applicant needs to be clear in terms of how the cycle routes shown on the Movement Framework Parameter Plan will integrate into the existing highway at the proposed ghosted right turn lane and the Worthing Road/Chessall Avenue Roundabout (where additional works have already been requested). It would be highly undesirable for cycle routes to simply terminate where these meet the existing highway.

58. WSCC are keen to understand how the on-site cycle routes are to be phased and delivered in light of the walking and cycling demands the proposed secondary school will generate within the local area. There would be clear benefit to an interim cycle route within the red line of the application site given the limitations of achieving any meaningful cycle improvements along Worthing Road.

Walking and Cycling Improvements

59. Schemes of walking and cycling improvements are shown for Worthing Road (drawing number ending TP-0107 revision P01), Two Mile Ash Road (TP-0105 revision P02), and Christs Hospital Road (TP-106 revision P01). Similar to the proposed vehicular accesses, these schemes of works will need to be road safety audited. The Applicant should also set out their intentions as to how these works are to be phased and delivered.

60. Taking these schemes in turn, the following comments would be offered.

61. Worthing Road (drawing number ending TP-0107 revision P01 - As mentioned in association with the proposed vehicular access, the footway should be extended northwards to the northbound bus stop. Consideration should be given in terms of the need for any further crossing improvements between the north and south bound bus stops.

62. Reference is made to a proposed pedestrian refuge and new crossing point linking north and south bound bus stops. There doesn't however appear to be a refuge shown.
63. It's not clear why a Toucan crossing is proposed; there doesn't appear to be a cycleway on either the east or west side of Worthing Road that a Toucan would then provide a connection between. A Puffin crossing would be more appropriate.
64. It should be noted that the dead tree indicated to the north of the Toucan crossing is in fact a telegraph pole that would need to be retained.
65. There's reference to an advisory cycle lane on Worthing Road. Given the width of Worthing Road, vehicular traffic would have to use the cycle lane at all times. As a result, the cycle lane would offer no benefit and should be removed. With regards to north/south cycle routes, the expectation is that the development will include a route ideally from an early point in the build out. This would then offer an alternative to using Worthing Road where there is limited opportunity for meaningful interventions.
66. There is reference to a 30mph speed limit sign to be placed near the roundabout. Is there intention to promote a reduced speed limit on Worthing Road where this is currently 40mph? The extent of any future speed limit should be indicated but will be subject to a separate process whereby the Applicant funds the Traffic Regulation Order, and then separately submits and implements a signing and lining scheme to install the amended speed limit should the TRO be supported. This will be covered by way of a s106 obligation.
67. Two Mile Ash Road and Tower Hill (TP-0105-01, TP-0105-02, TP-0105-03 revision P02) - It's presumed that the proposed footway can be accommodated without impacting upon the existing ditch, hedge, or trees. This should be confirmed
68. The build out south of the Christs Hospital Road junction is noted. It would need to be demonstrated that adequate forward visibility can be achieved from the give way lines to southbound vehicles. The build out is quite long so it will take time for a stationary north bound vehicle to get up to speed and clear the feature. Likewise, would a southbound vehicle have adequate time to react if a vehicle is passing through the build out? Given the restricted forward visibility on all approaches, there are concerns as to whether a build out in this location is appropriate.

69. The plan shows a notable narrowing of the road serving Christs Hospital School too. Some of the narrowing could be reduced (the footway on the eastern side seemingly doesn't need to extend into the access road as much as it does. It's not clear also how this is intended to be finished and how any kerbing tie in with the access road itself. Although it's appreciated that there are no controls over the use of the gated access to Christs Hospital School, at present the access is seemingly redundant and it's then whether a kerbed footway is needed in the access road at all.
70. The proximity of the build outs to the proposed development access is also a concern. The concern is that northbound vehicles may be on the wrong side of the carriageway and collide with opposing vehicles turning left from the proposed access.
71. LTN 1/07 would suggest that the build outs along Two Mile Ash Road and Tower Hill should be lit. It's unclear if lighting is intended for the features shown.
72. The Applicants attention would also be drawn to the WSCC 'Developer Funded Traffic Engineering and Traffic Calming Note. This Note sets out the process through which a developer should follow in the preparation and delivery of a traffic management scheme (which in the case of the development amounts to physical build outs) including consultation. The Applicant will still need to follow the guidance within this Note at the appropriate points in the development of the scheme.
73. Christs Hospital Road (TP-106 revision P01) - There are no particular concerns with the proposals along Christs Hospital Road, which are aimed at slowing traffic speeds and improving conditions for walking and cycling.
74. Hop Oast Roundabout Signalisation (TP-0109 (1) revision P02) – Comments here relate to the walking, cycling and equestrian works. Comments are made elsewhere regarding the overall design requirements and vehicular capacity benefits.
75. For the purposes of non-motorised road users, the signalisation of the Hop Oast Roundabout would offer a significant benefit. Traffic signals will enable at-grade controlled crossing facilities over the high speed and high trafficked A24. Crossing demands are expected to be significantly increased given the permitted development at Horsham Golf with the proposed educational uses within the proposed development providing a destination.
76. The provision of an at-grade crossing is considered more preferable to a grade separate arrangement (i.e. a bridge or subway) given the directness in comparison with a bridge for example that would in this location involve

considerably long ramps increasing time and distance. Subways are generally not preferred given the lack of natural observations and the perceived safety issue.

- 77.WSCC ask for further details in terms of the arrangements beyond the southern edge of the plan. It needs to be clear as to how the arrangements link up with existing provisions particularly for equestrians. There would be merit to the WSCC Rights of Way team commenting more upon this aspect especially in regards of surfacing.

Passenger Transport

- 78.Southwater benefits from two frequent bus services (23 and 98) that run into Horsham town centre and beyond. The short journey duration (approximately 7 minutes to Horsham bus station) makes bus use highly realistic. The bus strategy within the TA indicates that the Applicant will fund improvements to the 23 to provide a 15-minute peak time frequency as well as improvements to off peak services. These frequency improvements would be alongside those already secured to the 98 as part of Horsham Golf (which secured funding for a 15-minute daytime frequency). The combination of improvements to the 23 and 98 will result in a high frequency service arrangement that will benefit both developments and existing residents.
- 79.The Applicant should detail exactly what has been agreed with the bus operator concerning peak time and off-peak service improvements. These details can then inform any s106 obligation.
- 80.The services aside, improvements should also be identified to existing passenger transport infrastructure. The Applicant may also wish to investigate with the bus operator the feasibility of providing a further bus stop along the Worthing Road frontage with there being a significant distance between existing stops at present.

Framework Travel Plan

- 81.The implementation of a travel plan is another tool that can be used to promote sustainable transport amongst future residents. As noted, this is a Framework Travel Plan (FTP) with the requirement for full TPs to be provided as specific uses come forward. Based on experience elsewhere, the expectation is that school travel plans will fall outside of the FTP structure with these developed in association with the academy or trust operating the schools. The FTP therefore should focus on the residential and employment uses.
- 82.WSCC acknowledge that the FTP doesn't need to include full details of all travel plan measures. However, it still needs to set out the guiding principles

that will be included within future full TPs. At this stage, elements within the FTP are too vague and lack sufficient information.

83. For example, it would be expected for the FTP to include a clear monitoring regime with it set out when these are to be undertaken, how, and how these will then be reported. Fundamentally and related to the monitoring, it's not clear if there is to be a single full TP for the residential development or whether these are to be phased. The monitoring for either approach will be very different. Likewise with the various employment uses.

84. As a specific point, the undertaking of baseline travel surveys at 50% occupation is considered to be far too late. Although the travel plan will be implemented upon first occupation, by the time baseline surveys are undertaken, residents will have established travel habits that will be difficult to influence.

85. Whilst the FTP includes a lot of information, much of this is taken from the TA. Whilst this is useful background information, there is little within this that could meaningfully influence the production of future full TPs.

Walking, Cycling, Passenger Transport Summary

86. WSCC recognise that there is a limited ability for the development to provide off-site walking and cycling improvements that fully met current best practice. It is also acknowledged that the wider range of facilities proposed both within the development and in Southwater that can be reached by walking and cycling, and that in turn will limit the need to travel beyond Southwater for some journey purposes. The secondary school in-particular could result in a notable reduction in travel needs beyond Southwater.

87. It is apparent that the site with funding from both the proposed and the nearby Horsham Golf proposals, could achieve a high frequency bus service despite this being a relatively rural location.

88. The TA provides a detailed assessment of walking, cycling, and passenger transport. It is recognised that the works proposed (e.g. those at A24 Hop Oast Roundabout) will result in a wider benefit for existing users as well. Some walking and cycling improvements are identified despite the constrained nature of the surrounding highway network. Some of the improvements will require further consideration by the Applicant. Additional investigation would be needed also in terms of further potential works (particularly for cycling) to tie in with routes shown on the Movement Parameter Plan.

On-site Design Principles

89. It's appreciated that the current application is outline with only matters of access to be approved. There are nevertheless details that will dictate and

control more detail on-site matters. These are contained within the Design and Access Statement (DAS) and as shown on the Movement Parameter Plan.

90. With regards to the DAS,

91. Cross sections are included only for the primary route (referred to as The Village Way). Details should ideally be provided for all road types even if these are just set out in a table rather than cross sections.

92. With the sections of The Village Way, there are inconsistencies in terms of the cycle way width (2 metres on some sections, 3 metres on others. The sections should be revisited to ensure a 3-metre cycle way.

93. It's not clear why shared use is considered appropriate through the public square (page 94). This is likely to be the busiest area within the development and the primary location where segregation is required. Segregation should be indicated. It's also recognised to provide on both sides of the carriageway, which is potentially unnecessary. Given the public square/mixed use area will be a destination, it would perhaps make more sense to keep the cycle route on the west side of the primary road and then cross cyclists to the east side where the mixed use is situated.

94. The DAS should also be identifying a need for pedestrian and cycle priority at appropriate junctions. It should set out what will be provided at bus stops provided on the primary road.

95. The DAS will need to also include requirements for the development access road linking onto Two Mile Ash Road. The design of this road needs to include measures to limit vehicular access towards Two Mile Ash Road.

96. For the Movement Plan,

97. Comments are made elsewhere in this response concerning the Movement Plan. These aren't repeated again here.

98. The only additional comment is that it's not clear why the Key Cycle Route is shown as being site away from the primary road within the southwest corner of the development. The Key Cycle Route should provide the most direct route and should follow the primary road.

99. Given these documents and plans will be approved and will inform the detailed design, these details should be updated and additional information provided.

Other Matters

Car Parking at Christs Hospital Railway Station

100. The TA identifies potential additional car parking at Christs Hospital Station. The provision of additional car parking would potentially undermine the sustainable transport improvements proposed on Christs Hospital Road; a point that is acknowledged by the Applicant in their TA.
101. WSCC would only support the additional car parking if there is a clear need on road safety or other obstructive parking grounds that can be linked directly to the development. WSCC would also highlight that the provision of additional car parking may not resolve any parking issue especially if the parking incurs a fee. This is apparent at present where the existing paid for car parks have a plentiful availability of spaces yet there is an overwhelming use of the free parking within the nearby public highway.
102. WSCC therefore support the approach included within the TA inasmuch as car parking demands should be monitored through an agreed methodology (suggested as including surveys prior to any occupation (to establish a baseline), then at intervals of 250 occupations before concluding at the occupation of the 1,000th or final dwelling). The methodology should allow for the car park (or alternative measures to control parking) to be provided if any of the stages of the surveys indicate it as necessary. As part of this approach, it must be clearly identified who will take on and thereafter maintain the car park if provided; WSCC will not be the responsible authority in these regards.

Construction Management Plan

103. Reference is also made in the TA to an Outline Construction Environmental Management Plan being submitted within this application. This is immediately apparent within the submitted planning documents. WSCC Highway accept that matters relating to construction can be resolved through pre-commencement conditions. Given the location of the site and easy access to the A24 via the Hop Oast Roundabout, no immediate concerns would be identified. Routing controls should be in place to deter traffic from approaching through Southwater or via Christs Hospital.
104. Other matters (contractors parking, precise means of access, wheel washing, etc) can be dealt with on a phase-by-phase basis.

Further Actions and Conclusions

105. WSCC Highways have reviewed the submitted TA and information as listed above. There are a number of points for the Applicant to address and provide additional information for. These are,

- Agree those changes required to the proposed access arrangements (including A24 Hop Oast Roundabout) with WSCC and amend proposals accordingly,
- Undertake Design Audits for junctions/improvements where agreed necessary with WSCC Highways,
- Undertake Stage One Road Safety Audits for junctions/improvements where agreed necessary with WSCC Highways,
- To submit for agreement a monitoring approach to support the proposed transport vision,
- Provide further information in respects of the potential increased traffic on Two Mile Ash Road and Christs Hospital Road, which should include base traffic flows and outputs from the HTSM to highlight if additional non-development traffic will reassign to these routes,
- Clarify the purpose and need for vehicular access onto Two Mile Ash Road,
- Review the bus priority measures at the A24 Hop Oast Roundabout and provide for comparison modelling that excludes the bus priority works,
- Identify walking and cycling improvements in light of the connections shown on the Movement Parameter Plan,
- Review, amend, and provide further information (including a Stage One Road Safety Audit) to support the proposed walking and cycling improvements,
- Detail the specific scheme of service enhancements for the 23 bus service,
- Amend and update the Framework Travel Plan,
- Provide a detailed design code for the on-site roads, foot, and cycle ways,
- Review and update the suggested monitor and manage approach for the additional car parking at Christs Hospital Railway Station.

Ian Gledhill

West Sussex County Highways

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Matthew Porter
FROM:	WSCC Highways - Public Rights of Way
DATE:	20 March 2026
LOCATION:	Land North West of Southwater
SUBJECT:	DC/26/0366 Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.
DATE OF SITE VISIT:	n/a
RELEVANT PUBLIC RIGHTS OF WAY NUMBER(S):	Main site: BW1662, FP1660, FP1658, FP1656, FP1655, BW3568 (Downs Link) Outside site: FP1639_1, BW1642, BW1670
RECOMMENDATION:	Objection
S106 CONTRIBUTION TOTAL:	n/a

Thank you for the opportunity to comment on the above numbered planning application. This proposal has been considered by means of a desktop study, using the information and plans submitted with this application, in conjunction with other available WSCC map information.

As stated in the NPPF, para 104, *Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.*

Defra Rights of Way Circular (1/09) states *The effect that a proposed development will have on Public Rights of Way is a material consideration for planning authorities when deciding whether or not to approve a planning application. The potential consequences on Public Rights of Way must be taken into account. Information supplied by an applicant should therefore explain how the potential development will impinge on Public Rights of Way.*

Bearing the above in mind, my comments are as follows:

I note plans to sensitively enhance existing walking, cycling and bridleway routes to improve access and connectivity. Whilst overall welcome, the comments below relate to each of the Public Rights of Way (PRoW) effected.

Within the red line site boundary:

Bridleway (BW) 1662

I note and welcome the retention of recent improvements to BW1662 and the planned crossing across the primary road to provide safety for bridleway users. As equestrians can use the bridleway, a Pegasus crossing should be considered.

Footpath (FP)1658 and FP1660

Please note that parts of FP1658 and FP1660 run alongside ancient woodland. Any enhancements to the paths to cater for increased footfall must take this into account.

FP1655 and FP1656

It's proposed to enhance public footpaths 1656 and 1655 within the site to mitigate against increased usage from on-site users. Improved surfacing and widening where appropriate are welcomed as would be a signalised crossing across Worthing Road, linking into FP1656.

BW3568 (Downs Link, NCN Route 223)

The part of the Downs Link within the proposed site's red line boundary is programmed for drainage and surface improvements by WSCC in the 2026/27 financial year. We would therefore ask that the Downs Link within the site be retained as is and not be improved. My objection is partly on this basis.

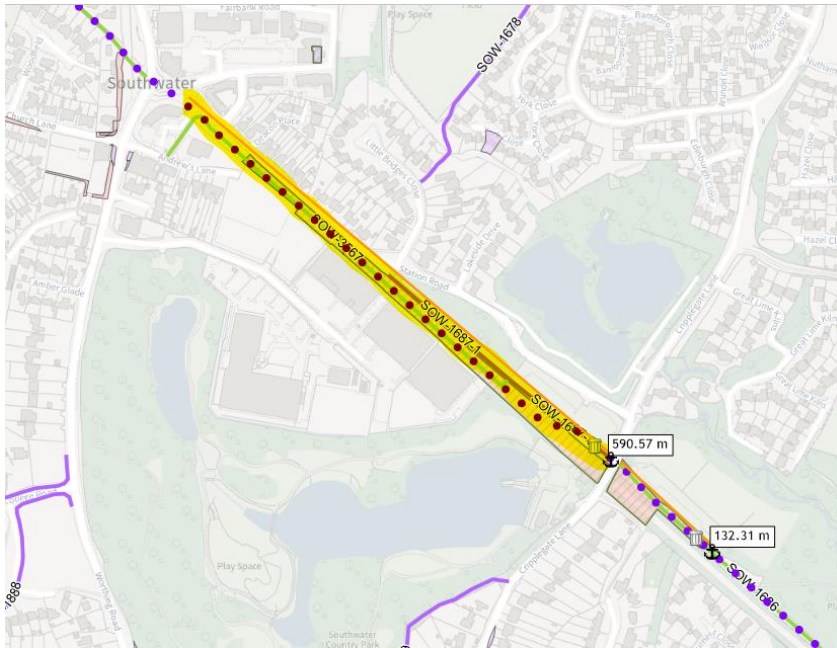
The section of the Downs Link between the site and Christ's Hospital has also very recently been improved and does not need any further enhancement or financial contribution towards it.

Financial contributions towards improvements along the Downs Link outside the site's boundary where occupants of the new site will travel would be welcomed via a S106 obligation however. These are described in the section below.

Outside the site boundary:

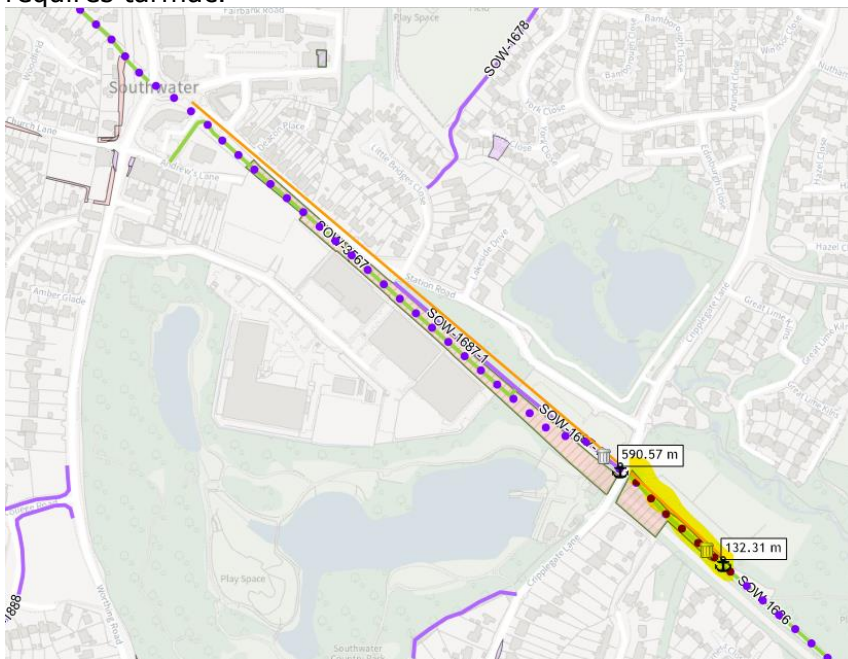
BW3568 (Downs Link, NCN Route 223)

A 590m section (highlighted) between the Southwater Health Centre and Cripplegate Lane would benefit from resurfacing with our standard Type 1 bridleway surfacing.



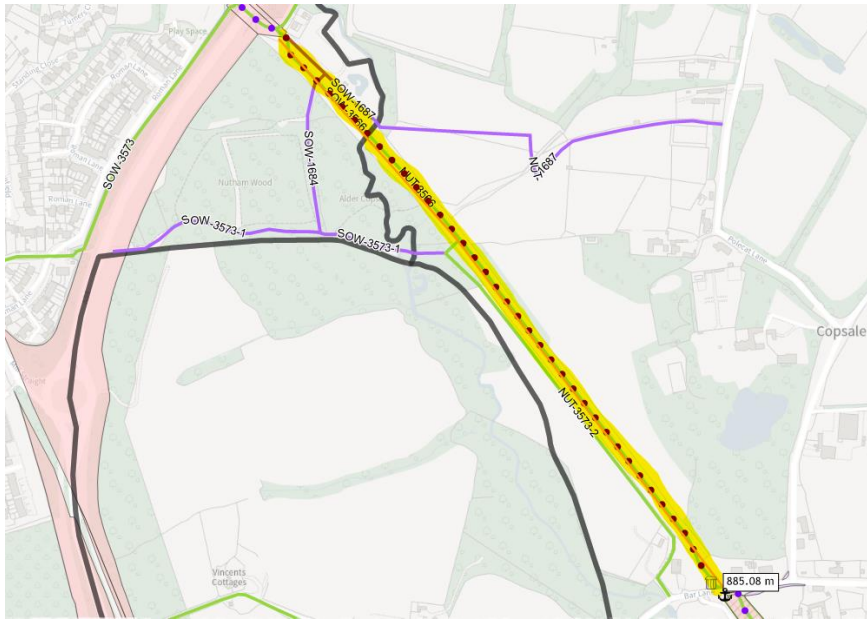
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East of Cripplegate Lane, there is a section approximately 132m long (highlighted) that requires tarmac.



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Finally, heading south-east of the A24 towards Bar Lane, surface improvements to our Type 1 Bridleway surfacing would mitigate against increased usage over approximately 885m.



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FP1639_1

I note the developer raises the possibility of enhancing FP1639_1 between Two Mile Ash Road to Longfield Road to enable cycle use. This would require landowner permission, the path to already have a 3m width, a financial contribution to cover the cost of physical improvements as well as a significant enhancement of the railway bridge to Network Rail's specification.

BW1642

There are sections of BW1642 that will require surface improvements to cater for the greater usage this development will result in. Being outside of the site's boundary, the local authority will decide if a S106 obligation or CIL should fund these.

The proposed improvements to the crossing between Bridleways 1642 and 1662 are welcomed but as equestrians have use of these bridleways, a Pegasus crossing should be considered.

Southwater to Horsham route via upgrading of Pedlars Way BW1670 public bridleways

I note the intention to provide active travel improvements that include the upgrading of Pedlars Way bridleway. Please be advised that a LTN 1/20 surface is inappropriate and will not be acceptable on a bridleway that must cater for equestrians as well as pedestrians and cyclists. With regards any white lining please note that no PRoW can be segregated – the full width must be available to all users. This proposal is also subject to an objection.

General notes

In the interests of improving accessibility across PRoW within the affected area, stiles should be removed if appropriate or replaced with gates where necessary. WSCC PRoW team can advise on suitable gates. Equally, no new structures, such as gates and stiles, are to be installed within the width of the PRoW without the prior consent of the WSCC PRoW Team. These will constitute an offence of obstruction under the Highways Act 1980.

Any intention to allow cycle use across existing footpaths must be achieved by legal agreement with WSCC PRoW team.

The granting of planning permission does not authorise obstruction of, interference to or moving of any PROW; this can only be done with the prior consent of WSCC, as highway authority, and possibly also a legal Order process by Horsham District Council as the local planning authority. Further advice can be provided on request.

Any plans to divert the route of any PROW will require a legal diversion Order. In order to secure such a diversion, a Public Path Order (PPO) would need to be made by Horsham District Council as the local planning authority, who could make such an Order under the Town & Country Planning Act 1990, Section 257. The WSCC PROW Team will be a formal consultee as part of this diversion Order application process and its prior agreement to a specification will be required before lending formal support to any diversion proposal. Development affecting the currently recorded legal line of any PROW must not begin until and unless the path has been formally accommodated else an offence is being committed and may invalidate any diversion Order procedure.

Where it will be necessary to permanently divert a path, WSCC PROW Team is not able to grant a temporary path closure as a precursor to a PPO. In such circumstance, WSCC PROW Team will only consider an application for a temporary path closure once the Local Planning Authority has made and confirmed a PPO.

Safe and convenient public access is to be available at all times across the full width of the PROWs, which may be wider than the available and used route – advice on the legal width can be provided by the WSCC PROW Team.

The paths are not to be obstructed by vehicles, plant, scaffolding or the temporary storage of materials and / or chemicals during any works. These will constitute an offence of obstruction under the Highways Act 1980.

Any down pipes or soakaways associated with the development should discharge into an existing or new drainage system and away from the surface of the PROW. No drainage system is to be installed through the surface of the path without the prior consent of the WSCC PROW Team.

Where the ground levels adjacent to the PROW are to be raised above existing ground levels, this could increase the potential to flood the path. A suitable drainage system must be installed adjacent to the path to a specification agreed with the WSCC PROW Team prior to development commencing.

Any alteration to or replacement of the existing boundary with the PROW, or the erection of new fence lines, must be done in consultation with the WSCC PROW Team to ensure the legal width of the path is not reduced and there is no unlawful encroachment.

Access along a PROW by contractors' vehicles, deliveries or plant is only lawful if the applicant can prove it has a vehicular right; without this an offence under the Road Traffic Act 1988 section 34(1) is being committed.

It is an offence to damage the surface of a PROW without the prior consent of the WSCC PROW Team. The applicant must supply a specification and secure the approval of the WSCC PROW Team before works affecting the PROW begin, even if the surface is to be improved. Where a PROW surface is damaged and there was no prior consent, the applicant will be liable and required to make good the surface to a standard satisfactory to the WSCC PROW Team.

Where it is necessary to undertake works within the legal width of a PROW, e.g. install utilities, (or for development works immediately adjacent to a PROW that can not reasonably be managed through different Health and Safety practice) the applicant must be advised to apply to WSCC PROW Team for a temporary path closure. The applicant

must be advised there is no guarantee an application will be approved; that a minimum of 8 weeks is needed to consider an application.

Consented development is often subject to various environmental requirements, which can impact on the availability of PROW. For example, Great Crested Newt fencing has often been known to be laid across a PROW, which is either subject to installation of unauthorised stiles or gates, or unlawfully diverted around the site edge. The applicant must be advised that any environmental licence, such as from Natural England, does not negate the need to provide the legal line of a PROW without additional structures.

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Rights of Way information is not definitive.

Donna Trethewey
Planning and Communities Officer
Public Rights of Way
West Sussex County Council