

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Matthew Porter
FROM:	WSCC – Highways Authority
DATE:	30 June 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.
RECOMMENDATION:	Advice / More Information

1. Comments are made in respects of,

- WSP Technical Note 1 – Response to West Sussex County Council Comments, dated 02/06/2026
- Proposed North Access Roundabout onto Worthing Road, drawing no. UK0043490.9681-WSP-XX-XX-DR-TP-0103 rev P04
- Worthing Road/Site Access Priority Junction Access Arrangement, drawing no. UK0043490.9681-WSP-XX-XX-DR-TP-0101-01 rev P03
- Worthing Road Highway Improvements, drawing no. UK0043490.9681-WSP-XX-XX-DR-TP-0107 rev P03
- Secondary Road/Chessall Avenue Priority Junction Access Arrangement, drawing UK0043490.9681-WSP-XX-XX-DR-TP-0100-01 rev P03
- Two Mile Ash/Site Access Priority Junction Access Arrangement, drawing UK0043490.9681-WSP-XX-XX-DR-TP-0102-01 rev P03
- Proposed Gypsy and Traveller Left In and Out onto Worthing Road, drawing UK0043490.9681-WSP-XX-XX-DR-TP-0103_04 rev P02
- General Arrangement B2237 Worthing Road/A24 Hop Oast Roundabout, sheets 1 and 2, drawings UK0043490.9681-WSP-XX-XX-DR-TP-0109 (1) rev P03 and UK0043490.9681-WSP-XX-XX-DR-TP-0109 (2) rev P01
- Worthing Road Highway Improvements, drawing UK0043490.9681-WSP-XX-XX-DR-TP-0107 rev P03
- Proposed Cycle Improvements on Two Mile Ash Road, drawings UK0043490.9681-WSP-XX-XX-DR-TP-0105-01, 02, and 03 all rev P03

- Design and Access Statement, rev A, dated May 2026
2. WSCC Highways have previously been consulted and provided advice in respects of the highways and transport implications of this development proposal. The previous WSCC comments are dated 23rd March 2026.
 3. A number of points requiring action were raised by WSCC Highways. The Applicant has consequently provided an itemised response to each of these points within the submitted Technical Note (TN). Taking these points and the Applicant's response, WSCC would provide the following further comments.

Road Safety Audit requirements

4. The Applicant has undertaken independent Stage One Road Safety Audits for all of the proposed works within the existing public highway. The RSAs are contained within appendix B of the TN.
5. The Stage One RSAs have been reviewed by WSCC and RSA Responses have been completed as necessary. For the purposes of the information in appendix B, some of the RSA Responses aren't complete with there being an on-going dialogue between the Applicant and WSCC to finalise these matters. Whilst no fundamental or in-principle issues remain, the RSA process needs to be completed.

Proposed Four Arm Worthing Road Roundabout

6. Details are shown on drawing UK0043490.9681-WSP-XX-XX-DR-TP-0103 rev P04.
7. Several points were raised relating to the proposed roundabout. Firstly, a Design Audit has been undertaken and submitted to WSCC. Tracking for a 16.5 metre HGV is included as part of this. This is presently under review, although in-principle the Design Audit does not identify any issues within the design. The roundabout therefore appears to comply with current standards.
8. It's noted that the Design Audit includes the parallel crossings and segregated route. These have been updated and altered to alternate provisions. These elements do not however affect the overall acceptability of the roundabout itself.
9. Secondly, the previously proposed parallel/Zebra type crossings have been replaced with Toucan crossings. Toucan crossings are considered more appropriate in this situation given the traffic flows.
10. Finally, the previously proposed segregated walking/cycling route connecting from the development to the proposed traffic signals at the A24 Hop Oast roundabout has been altered to a 4-metre-wide shared use route. The provision of shared use allows for a much simpler arrangement between the proposed crossing points and ultimately is considered appropriate considering the expected level of use.

Proposed Worthing Road Priority Junction

11. Comments are made against the details on drawings UK0043490.9681-WSP-XX-XX-DR-TP-0101-01 rev P03 and UK0043490.9681-WSP-XX-XX-DR-TP-0107 rev P03
12. Similar to the previous junction, WSCC requested the Applicant to undertake a Design Audit demonstrating that the proposed junction complies with current design standards. Again, the Design Audit is presently under review although the Audit does not identify any in-principle issues.
13. In reviewing the design, WSCC is also mindful of the Applicants proposal to fund and thereafter implement a Traffic Regulation Order to reduce the existing 40mph speed limit to 30mph. Whilst the outcome of the TRO process cannot be guaranteed, a 30mph speed limit would be more appropriate in light of the changing context on Worthing Road arising from the development. The funding of the TRO, and if successful, the implementation of a suitable scheme of signing and lining to implement the 30mph speed limit should be included in the s106 agreement.
14. It's noted that an additional length of footway has been provided northwards on the western side of Worthing Road from the proposed access to the nearest bus stops. This addresses the previous request from WSCC Highways.

Realigned Chessall Avenue

15. Revised details are shown on drawing UK0043490.9681-WSP-XX-XX-DR-TP-0100-01 rev P03.
16. No particular comment was made by WSCC concerning the realignment to Chessall Avenue to create the development access.
17. The only WSCC comment here was more in relation to the proposed cycle route. The arrangement has been revised and now includes a shared use route on the north side of Chessall Avenue that connects to Cedar Drive via a proposed Zebra crossing on Worthing Road to the north of the Cedar Drive roundabout. This arrangement avoids cyclists having to rejoin the carriageway on Chessall Avenue and negotiating the existing roundabout with other vehicular traffic. The proposed arrangement continues to tie-in with the proposed segregated route within the development and that thereafter continues on-carriageway towards Lintott Square using the lightly trafficked residential roads of Chessall Avenue and Kensett Avenue, and thereafter Downs Link.
18. In terms of the details, WSCC recognise that it will be necessary to convert a short length of existing footway on the eastern side of Worthing Road leading into Cedar Drive to shared use. Some of this route is narrow particularly that leading onto Cedar Drive. For the purposes of achieving the continuous

route, a short narrow section is considered appropriate to complete the route and would fall within the guidance in LTN 1/20.

19. The only further comment from WSCC is the use of Zebra crossings. Whilst the principle of Zebra crossings is considered appropriate (there already being two to the south of the Cedar Drive roundabout), given that the crossing ties in with a shared use route, WSCC would request that consideration be given to the use of Parallel crossings instead. These would retain the same principle as a Zebra crossing but would provide separate crossings for pedestrians and cyclists. Details of the crossings could be reserved and considered by condition without impacting upon the proposed junction or shared use route.

Priority Junction onto Two Mile Ash Road

20. Comments are made against drawing UK0043490.9681-WSP-XX-XX-DR-TP-0102-01 rev P03.

21. With the issues previously raised, WSCC recognises the potential future use of the access and the need for this to accommodate coaches travelling to and from the nearby Christ's Hospital School. An overly large junction is therefore required. It's noted that the southern kerb radii been reduced, providing a minor decrease to the overall junction size.

22. Visibility splays are presented based upon the existing speed limit.

23. Traffic management measures are shown alongside the proposed junction. These are commented upon separately.

Proposed Worthing Road Left In, Left Out Access

24. Comments are made against drawing UK0043490.9681-WSP-XX-XX-DR-TP-0103_04 rev P02.

25. The principle of this access has been previously accepted. The only point WSCC raised was the need to show visibility splays. Splays of 2.4 by 64 metres are now shown. It's not clear how these have been derived though; 64 metres neither complies with that within Manual For Streets for a 30mph or the DMRB for a 40mph. WSCC would also highlight that the proposed 30mph speed limit is indicated elsewhere in the TN to be extended to a point south of Blakes Farm Road Roundabout. The speed limit in the location of the proposed access would therefore remain as is. This aside, it would appear that an exiting vehicle has a clear line of site towards the respective exits from the roundabouts to the north and south with these roundabouts acting to slow traffic.

26. It would still be useful to have clarification over the visibility splays point though.

A24 Hop Oast

27. Comments are made against drawings UK0043490.9681-WSP-XX-XX-DR-TP-0109 (1) rev P03 and UK0043490.9681-WSP-XX-XX-DR-TP-0109 (2) rev P01.
28. The submitted Design Audit and response to the WSCC comments are currently under review by the WSCC Traffic Signals team. Further comments will be provided in due course. Again, the Design Audit does not raise any fundamental or in-principle issues. Where a departure is identified, this applies equally to the existing as-built and in use roundabout. The Applicant may still need to apply for a Departure from Standard given the existing roundabout is to be changed to a signalised arrangement.

Monitor and Manage Strategy

29. As background, WSCC Highways identified a requirement for a monitoring strategy to support the Applicants proposed 'Vision-led' approach. A proportionate strategy is standard and key element of this overall approach. Whilst the Applicant has provided some text and indication as to what could be included, there isn't any actual strategy at this stage.
30. A further discussion with the Applicant on this would be beneficial to understand exactly what's intended and how this will be secured. Additional measures beyond those listed in the TN may be required. This could include enhanced or travel planning rather than necessarily additional physical highway works.

Potential Development Traffic Increases on Two Mile Ash Road and Christs Hospital Road

31. The Applicant was invited to provide further outputs from the traffic model in respects of potential traffic increases on those roads to the west of the site resulting from the formation of the proposed Two Mile Ash Road junction. These increases at network peak times are set out in tables 1 and 2 within the TN.
32. Whilst not affecting the overall conclusions, as a point of clarity, Two Mile Ash Road becomes Tower Hill to the north of the Christs Hospital Road junction. For the purposes of this response, WSCC will be consistent with the road names within the respective tables.
33. It's noted that scenarios are run with and without the development in order to provide a comparison. It should be recognised that whilst the 'with development' modelling includes the proposed development trips, the model also redistributes existing/non-development traffic.
34. In the AM peak, the modelling estimates an approximate doubling of north/east bound movements on Two Mile Ash Road (Tower Hill) to the north of Christs Hospital Road along with a doubling of both east and west movements on Christs Hospital Road. The base level of traffic on these routes is very low and amounts to approximately 1 vehicle movement per

minute on average in the peak hour. The development would result in a vehicle movement every 30 seconds instead.

35. In the PM, the do minimum (without development) scenario implies a much greater and significant level of vehicle movements on certain routes, notably Two Mile Ash Road (north of Christs Hospital Road). Given this situation, the redistribution impact from the development on these routes is not considered significant. On other routes, such as Christs Hospital Road, there will be an increase in traffic particular to the north/east, resulting in approximately two eastbound vehicles and approximately three westbound vehicles per minute respectively during the PM peak hour.
36. As noted in the TN, the modelling does not factor in the proposed traffic management measures on Two Mile Ash Road/Tower Hill that may slow traffic (notwithstanding the views of WSCC on these features within point 49) or the signalisation of the A24 Hop Oast Roundabout that will remove any existing capacity constraints. The modelled flows are consequently potentially overestimating the impact of redistribution. The model outputs are therefore viewed with a degree of caution.
37. In this instance, it may be more appropriate to monitor traffic flows within an agreed study area to determine whether the development has resulted in an increase in vehicle movements and from this whether any adverse impacts (safety or otherwise) have resulted. If an impact is identified, an appropriate scheme of mitigation would then need to be submitted and agreed to address the specific problem. Such mitigation could entail the scheme of buildouts presently shown on Tower Hill (subject to any design issues being resolved and the principle shown to be appropriate) with the monitoring then demonstrating an actual need for these features. A monitored approach could be secured via the s106 agreement. Similar approaches have been used elsewhere, for example, in association with the Mowbray development where similar issues concerning the potential for increased traffic on rural roads were identified.
38. In summary, WSCC acknowledge that the opening of a new access and the provision of a through route from Two Mile Ash Road into Southwater has the potential to result in the redistribution of existing traffic as well as new trips associated with the development. The increase in trips on these rural roads is not desirable as some of the roads may lack provision for pedestrians, albeit for the most part, the roads referenced predominantly allow unrestricted two-way movement of traffic. Given there is a degree of uncertainty as to the exact volume of traffic that may redistribute, WSCC would recommend a traffic monitoring approach with measures then implemented should the monitoring demonstrate specific issues.

A24 Hop Oast With and Without Bus Lane Scenario

39. To enable a comparison, WSCC sought a scenario for the A24 Hop Oast Roundabout that excluded the proposed bus lanes. The reasoning for this

was to determine what impact the bus lanes have on the overall junction operation, and from this whether a more balanced operation would be achieved for the whole junction if bus lanes weren't included.

40. From the with and without bus lane scenarios, it's apparent that the bus lanes result in little discernible impact to the overall junction operation. WSCC acknowledge the significant and wider benefit resulting from the signalisation of the roundabout both in terms of traffic management but also with the provision of controlled crossing points. Given the Design Audit is presently being reviewed, WSCC will confirm it's final position on the proposed A24 Hop Oast scheme in due course.

Walking and Cycling

41. There were various points made concerning walking and cycling in terms of the assessment of existing routes but also in terms of those proposed improvements. Some of the matters raised have been addressed separately in this response.

42. In terms of the 'Walking Audit, this has been updated and included in Appendix I. From this and beyond those schemes referenced in this response, WSCC understand that no further off-site walking and cycling improvements are proposed.

Worthing Road Improvements

43. Several comments were made in respects of the various improvements shown on Worthing Road. The Applicant has provided an itemised response within their TN and with an updated scheme of improvements on drawing UK0043490.9681-WSP-XX-XX-DR-TP-0107 rev P03. It's noted also that the scheme has been revised following the Stage One RSA.
44. It's presumed that the scheme as a whole will be brought forward as single package of works rather than parcelled into various phases of works with triggers linked specific access or development works. If the works are to be phased, this would require separate drawings with a clear trigger provided against them. For the most part, the works are relevant to the proposed Worthing Road priority junction with right turn lane and the opening of the secondary school. As such the expectation is that all the work shown will be completed prior to the opening of the secondary school.
45. The exception to the above are those works to the Cedar Drive roundabout. These works are relevant to the proposed Chesall Avenue access and the associated cycle route.

Interim Cycle Route

46. The Applicant's comment regarding the provision of an interim cycle route through the development ahead of the primary cycle route on the spine road are noted. It's accepted that it may not be possible to commit to a specific route at this time and that the delivery of the secondary school may require

access from Worthing Road initially. However, there needs to be an in-principle commitment to this to then inform the inclusion and wording of a planning condition.

47. It would be highlighted that the overall acceptability of the development would not be predicated upon the provision of an interim cycle route. There are very much clear benefits to the provision of this route in light of the proposed phasing, the likely duration of the buildout, and the poor alternate provision for cyclists on Worthing Road. WSCC would look to further commitment towards these works.

Traffic Management on Two Mile Ash Road, Tower Hill, Christs Hospital Road

48. Details are shown on drawings UK0043490.9681-WSP-XX-XX-DR-TP-0105-01, 02, and 03 all rev P03.

49. For the most part, the scheme of works remains as previously presented. The works have been the subject of a Stage One RSA has been undertaken of the works but there is no technical assessment of the works nor any information provided of recorded vehicle speeds or flows. Traffic flows are very much relevant to ensure there is sufficient opposing traffic flow to actually warrant the provision of buildouts/narrowings. If there is little to no opposing traffic, the buildouts won't perform any particular purpose and traffic will use the route as it does currently. The Applicant needs to be quite clear as to what purpose the proposed measures are intended to serve and that the measures will achieve these in light of the local context.

50. Notwithstanding the above, despite the RSA raising no issues, WSCC have concerns in terms of this scheme of build outs. The specific concerns are as set out below.

51. Several buildouts are proposed on the northbound approach to the proposed Two Mile Ash Road priority junction. Even with signing and lining, WSCC are concerned as to whether drivers would be anticipating these features on what is a rural road.

52. WSCC would also raise the likely need for these features having to be lit although this may entail lighting only the feature itself. Whilst not a highway matter, the Local Planning Authority may wish to consider the overall landscaping impact of these features and the associated signing, lining, and lighting on what is a predominantly rural situation.

53. WSCC also have significant concerns with the buildout to the south of the Christs Hospital Road junction. As previously raised, the overall length of carriageway narrowing is fairly significant and it would take a northbound driver some time to clear the feature once they've decided that it was clear to proceed. As part of this, vehicle speeds for a southbound driver are assumed as 30mph whereas they may of course be greater. Despite what is shown on the drawing, forward visibility for southbound vehicles is likely to be

influenced by vegetation within the verge further restricting a drivers view to northbound vehicles and the feature itself. WSCC have a safety concern as to how the feature would operate.

54. In looking at the design of this buildout, WSCC recognise that a footway needs to be provided from the proposed access to connect to the existing footway on Christs Hospital Road. WSCC acknowledge that an option has been previously considered to include an east/west crossing point at the northwest corner of the development site and in the immediate vicinity of the Christs Hospital Lane junction. This option is not viable due to the alignment of the carriageway restricting visibility.

55. In looking at this option, WSCC consider it may be more appropriate to compromise on the footway and carriageway width over the short section where the buildout is proposed. Such an option would retain two-way vehicle movements but may entail a narrower footway. Whilst it would be undesirable to narrow the footway, this would only be over a short distance considering the route as a whole.

56. Linked to the above, WSCC would also suggest the remove of that length of footway on the northern side of the access road leading into Christs Hospital. This length of footway significantly narrows the existing access (albeit this appears presently unused). There seems no reason why this access road could not then operate as shared use negating the need for the footway and any associated access road narrowing.

57. WSCC would encourage a further dialogue with the Applicant on these features.

Passenger Transport

58. Two points were raised in respects of this. Firstly, the Applicant has agreed an approach with the local bus operator to enhance the peak and off-peak 23 bus service. The exact nature of the bus service enhancements are set out in the TN as being,

- Service enhancements to the 23 service that may cover.
- 0655 Crawley - 0844 Worthing / 0859 Worthing - 1036 Crawley
- 1305 Crawley - 1439 Worthing (23X) / 1506 Worthing - 1638 Crawley (23X)
- Potential for additional daytime vehicle to provide a more consistent timetable throughout the day addressing the hours without half-hourly trips or extending the existing Crawley to Horsham 'short services' to Southwater; and

59. It's noted that the bus operator may also use any funding towards improvements to the existing 98 service.

60. Both the 23 and 98 services are understood to be operated on a commercial basis. As a result, WSCC cannot receive contributions towards these service enhancements as WSCC has no involvement in the operation of these

services. The funding of any improvements would need to be agreed directly with the bus operator.

61. For the purposes of the s106 agreement, WSCC would recommend the inclusion of a bus service improvement clause that includes the above details as well as including wording to allow flexibility over how the contribution may instead be used. It's recognised that the Applicant may want to agree a financial value for these enhancements with the bus operator and for this to be included in the s106 as a total cap. A suitable trigger would also be appropriate.
62. The second point concerned the nature of any improvements to bus stops. The Applicants response to this point is noted with it presently undetermined whether a bus service would route through the site (and thereby require bus stops) or whether existing routing would remain unchanged (in which case existing stops on Worthing Road would then be improved).
63. The Applicant's suggestion to include a suitable s106 obligation is acknowledged and accepted. The trigger for a decision on any such works would be prior to the main spine road being complete and open to through traffic. The obligation should detail the bus stop infrastructure to be provided (namely real time, seating, and shelters (noting that WSCC does not adopt or maintain bus shelters)).

Framework Travel Plan

64. A revised Travel Plan (TP) has been provided in response to the comments made previously by WSCC. In reviewing the revised TP, WSCC acknowledge that this is a framework TP and that detailed TPs will be produced in due course. There are consequently elements that need not be agreed now. However, there are aspects that do.
65. Looking at the revised TP and the issues previously raised, most appear to remain outstanding. For example,
66. It would seem that a single TP based on the submitted framework is proposed covering all of the residential dwellings with a single TP then proposed for all of the commercial units. Ordinarily for a development of this size, there is an expectation for a phased approach towards travel planning for the residential units and individual TPs for the commercial units. Such an approach would then be more manageable in terms of implementation and monitoring. This approach would also allow individual phase TPs to be tailored to suit the status of the development (i.e. early phases would not have the benefit of a wide range of on-site facilities compared with those later phases). Likewise, the commercial uses will potentially operate differently with some companies having specific measures for the TP whereas others may not. An overarching commercial TP may not in practice be a deliverable option.

67. As previously indicated by WSCC, the monitoring regime needs to be revisited. The undertaking of a baseline survey after the occupation of 100 dwellings is accepted. However regular monitoring should be undertaken at agreed intervals (typically biennially) thereafter; further monitoring cannot wait until the 50% of all dwellings are occupied as this could be a significant time after first occupation. Regular monitoring would ensure that the TP is on-track and that the targets are on-course to be met. Final monitoring would be required after the final occupation to ensure targets are met and that no further remedial actions are needed.

68. WSCC accept that many of the detailed aspects, such as the measures to be employed to achieve the targets, can wait for the full TP. However as previously stated, there are framework principles that do need to be correct given that the framework TP is being approved and that this will be the document upon which the residential and commercial use TPs will be based.

Design and Access Statement

69. Several detailed points were raised by WSCC Highways regarding highway design matters in the Design and Access Statement (DAS). Most have been addressed.

70. The only matter is the provision of pedestrian and cyclist priority at junctions (which may include setback or partial setback crossings). The absence of references to pedestrian/cyclist priority is more an element that will be expected to be picked up through subsequent reserved matters applications.

71. WSCC have no further comments concerning the principles within the DAS or the details shown on the Movement Parameter Plan.

Christ's Hospital Car Parking

72. It's noted that the proposed car parking no longer forms part of the development proposals. WSCC recognises that the development is providing enhanced walking and cycling access to the station. The submitted TN also indicates a contribution being made to improve cycle parking. Such works would be within the station forecourt and as such outside of the area of control of WSCC Highways. Any contributions in these respects should not be directed to WSCC.

73. WSCC would still recommend that car parking at the station and in the immediate area is monitored (as suggested within the initial WSCC Highways response) even if the now withdrawn additional area of car parking is then not provided should demands require it. If the monitoring shows significant parking increases, an additional package of works may then be required to address any specific adverse impacts generated by the increase in car parking. These measures may include additional waiting restrictions, bollards, or likewise refreshing or replacing such existing lining or features, or likewise further improvements to enhance walking/cycling routes to the station.

Conclusion

74. The additional information submitted by the Applicant has or is currently under review by WSCC. Further comments will be made in due course concerning the various design audits although in-principle there doesn't appear to be any significant design issues with any of the proposed accesses or junctions. In terms of other matters, WSCC have on-going concerns with the proposed traffic management measures on Two Mile Ash Road and would suggest that alternate options are considered. There are also potential issues with the Framework Travel Plan. WSCC would welcome a further discussion to resolve these final outstanding matters.

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