

Land south of Smugglers Lane, Barns Green: Transport Appraisal Response to Itchingfield Parish Council

Ref: NM/HC/ITL200844-009

Date: 16 June 2026

1 Introduction

- 1.1 iTransport has produced a Transport Statement, Travel Plan Statement, and supporting plans and documents to support Miller Homes and Miller Developments in relation to development at Land south of Smugglers Lane, Barns Green (the site) (Horsham District Council planning application reference: DC/25/20570).
- 1.2 The planning application has been supported by the following transport documents:
- **Transport Statement** (reference: NM/HC/GV/ITL200844-003A), dated 18 September 2025
 - **Technical Note: RSA1 GG119 Response** (reference: HC/ITL200844-005), dated 22 August 2025 – included as Appendix E of the Transport Statement
 - **Travel Plan Statement** (reference: NM/HC/GV/ITL200844-004A), dated 23 March 2026
 - **Technical Note: WSCC Highways Consultation Response** (reference: NM/HC /ITL200844-008), dated 1 May 2026
 - **Technical Note: Access Design Review** (reference: NM/HC /ITL200844-006B), dated 29 May 2026
 - **Technical Note: Parking Stress Review** (reference: NM/HC /ITL200844-007B), dated 29 May 2026
- 1.3 These documents have been subject to a thorough review by West Sussex County Council (WSCC) as the relevant local authority (LHA) to determine the acceptability of the development proposal and their impact on the local transport networks.
- 1.4 Responses have been received from WSCC as follows:
- WSCC Pre-app Response, Jamie Brown, dated 17 July 2025
 - WSCC Consultation, Jamie Brown, dated 30 January 2026 – Recommendation: No Objection
 - WSCC Consultation, Jamie Brown, dated 28 April 2026 – Recommendation: Advice
 - WSCC Consultation, Jamie Brown, dated 11 June 2026 – Recommendation: Advice

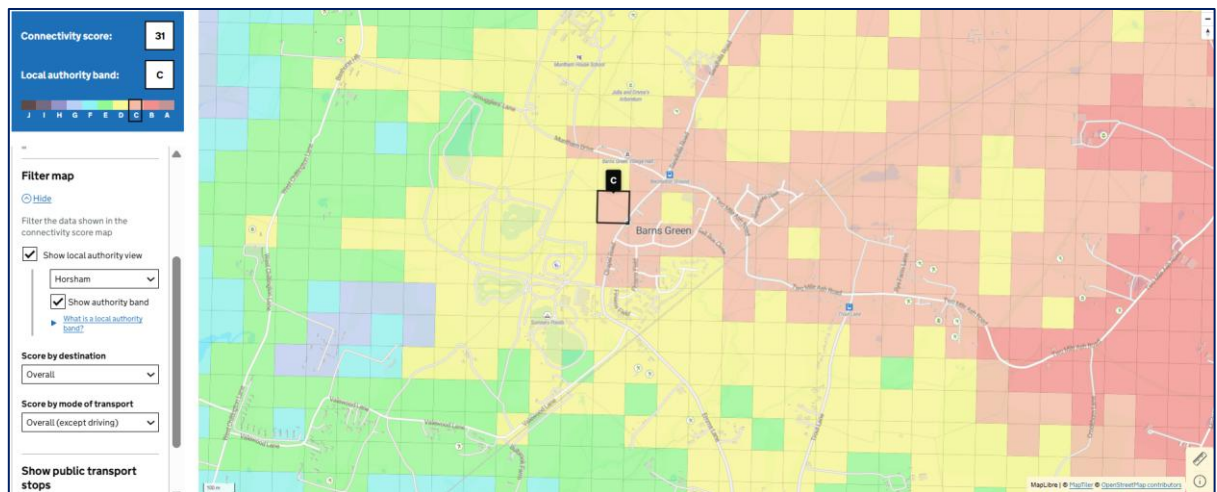
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- 1.5 In summary, following the receipt of updated information by iTransport, WSCC has concluded that the site is in a sustainable location, suitable for development, and that safe and suitable access is provided for all modes.
- 1.6 Itchingfield Parish Council has appointed John Russell Transport Planning (JRTP) to undertake a review of the documents submitted with the application.
- 1.7 The JRTP report has raised two main areas for further review; namely the sustainable location of the site, and site's access form and position to Chapel Road.

2 Sustainable Location

- 2.1 The JRTP commences with a review of relevant transport planning guidance. It references paragraph 115 of the National Planning Policy Framework (NPPF) to conclude that it should be ensured that development should be located where "sustainable transport modes are prioritised taking account of the vision for the site, the type of development, and its location".
- 2.2 What the JRTP report does not do is focus specifically on this wording, and in particular the final word. It is clear that the NPPF makes an allowance that not all locations are equal. Instead, a judgement should be made to determine whether the level of sustainable travel mode uptake is prioritised in the context of the site's location. In this case, the site is situated in the heart of the village, where a convenience retail (shop) and post office, and local public house are located opposite the site. Within 400m of the site (a five minute walk), the local village hall (offering local community facilities), a sports and social club, and primary school, and a café are all available. Local buses provide direct services to local senior schools.
- 2.3 The site provides new uncontrolled pedestrian crossings of Chapel Road, to provide direct connections to the existing public footway on the eastern (opposite) side of the carriageway. It also provides a direct pedestrian footway connection from the site, to the Smugglers Lane public right of way along the site's northern boundary. These crossings provide direct pedestrian access, via street lit footways to the shop and public house, and onwards to the primary school (and bus stop/shelter). It also connects to the recently introduced drop kerb crossing and footway from Chapel Road to and along Muntham Drive to the sports club and village hall.
- 2.4 Therefore, in the context of the site's location, the site is sustainably located, with many every day travel needs accommodated via existing safe walking connections from the site.
- 2.5 The JRTP report utilises the Department for Transport's Connectivity Tool to determine the site's level of sustainable connections to local services and facilities. It should be noted that this is just a tool, and is not a pre-requisite for determining how well connected a site is. As identified by JRTP, it does not assess the quality of routes used to access destinations. It provides a measure of potential connectivity, while detailed assessment of route quality and necessary infrastructure improvements must be undertaken separately by designers and transport professionals.

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- 2.6 In addition, the emerging (draft) NPPF from December 2025 identifies that the tool should be used alongside other relevant evidence in assessing the connectivity of particular locations proposed for development.
- 2.7 The Tool identifies the site has a connectivity score of 31. This is at the site's access to Chapel Road.
- 2.8 JRPT uses this information, including a further review of the connectivity score by a variety to travel modes, to make a conclusion that the site is poorly connected to services and facilities by sustainable modes. JRTP make no comment on the physical ability to access these services.
- 2.9 As noted above, the adopted NPPF is clear that the connectivity of a site should be determined based on its relative location. The DfT's Connectivity Tool has been designed to allow for these local differences, to ensure that sustainable connectivity can be determined at the local context, not just at the national context.
- 2.10 The JRTP report correctly identifies that the Connectivity Tool provides scores that are expressed as a percentage relative to the most connected locations in England and Wales. Unsurprisingly, those locations with the highest scores are located in city and town centres.
- 2.11 However, what the JRTP report fails to do is to consider the site's connectivity at the local level. This is possible by using the local authority band filter within the tool. Bands help to assess how well-connected a location is relative to its local authority area, by dividing the local authority into ten bands from A (high scoring) to J (low scoring). Each band represents approximately one-tenth of that local authority's area.
- 2.12 By looking at the site in the context of Horsham district, a very different conclusion is made to that in the JRTP report.
- 2.13 As shown in Image 2.1, compared to rest of Horsham district, the site has a connectivity band of C for all journey purposes by all sustainable travel modes; i.e. it is in the top 30% most connected locations in all of the district.

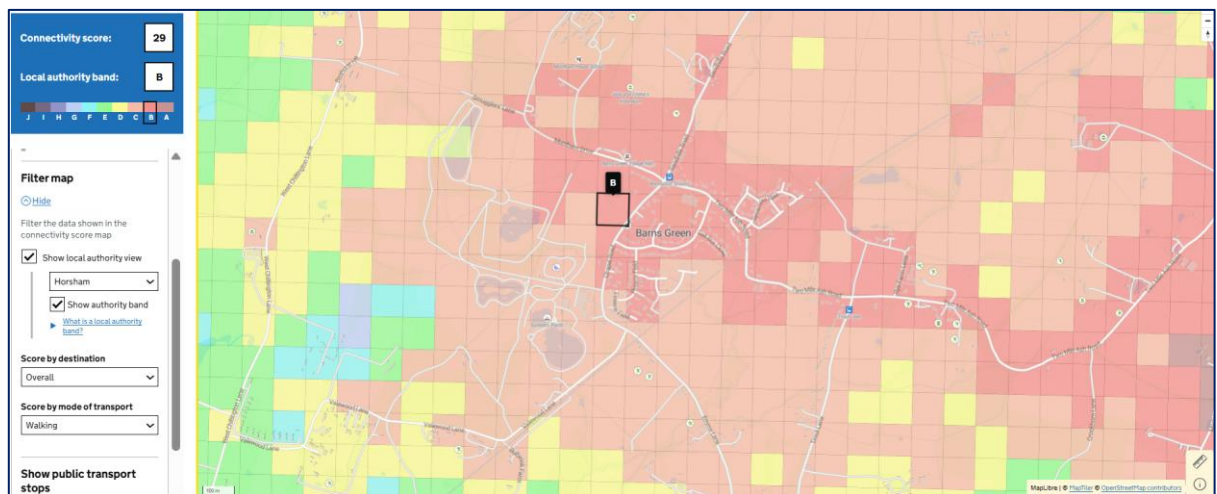
Image 2.1: Site's Local Connectivity Band (all sustainable modes/all purposes)



Source: DfT Connectivity Tool, obtained 15 June 2026

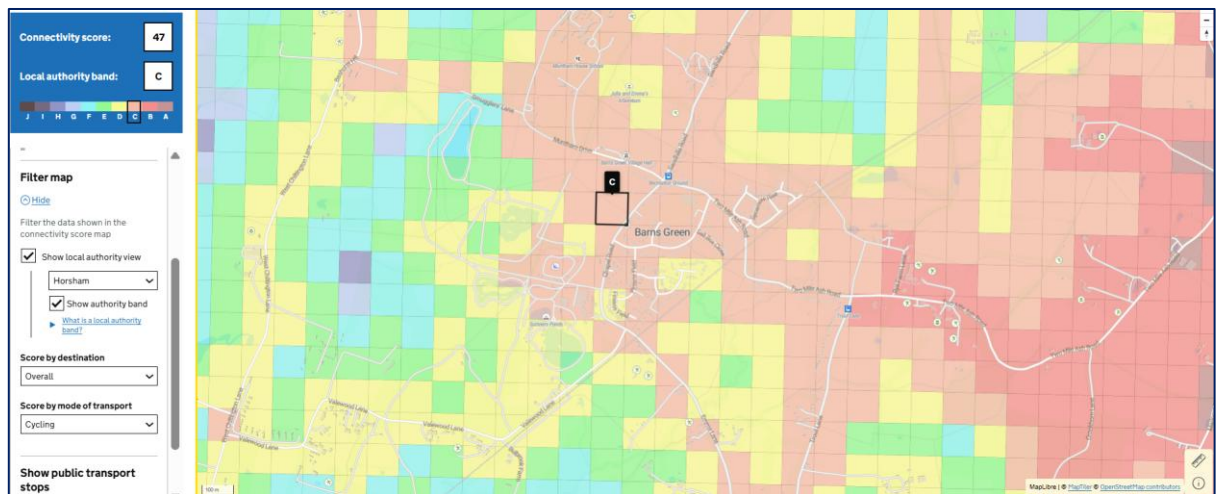
- 2.14 Further when consider the hierarchy of travel modes, where walking is the most important, followed by cycling, then public transport, then private travel, the site scores a banding of B for walking and C for cycling (as shown in Image 2.2 and 2.3), and D for public transport (Image 2.4)

Image 2.2: Site's Local Connectivity Band (walking /all purposes)



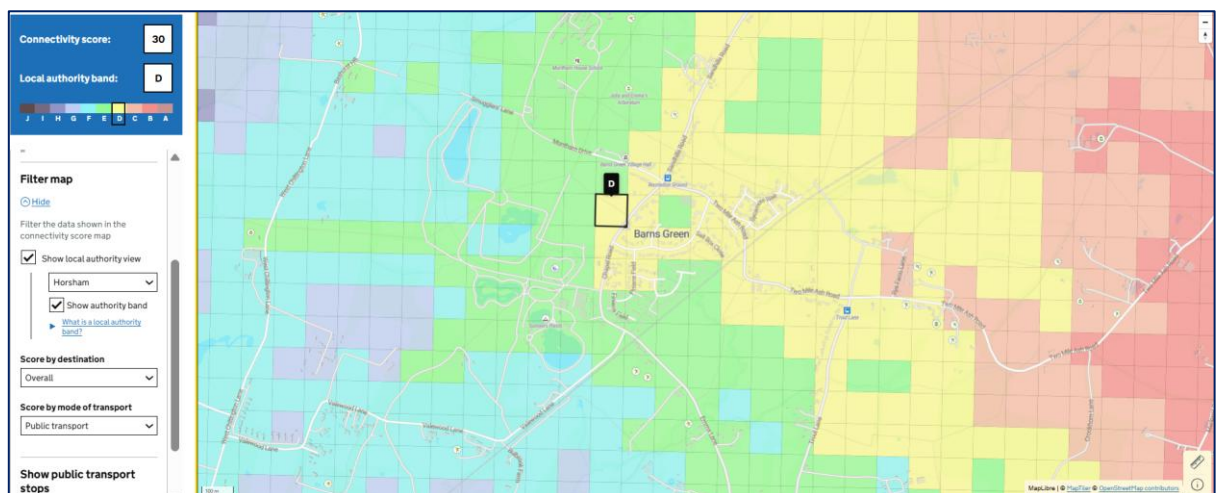
Source: DfT Connectivity Tool, obtained 15 June 2026

Image 2.3: Site's Local Connectivity Band (cycling/all purposes)



Source: DfT Connectivity Tool, obtained 15 June 2026

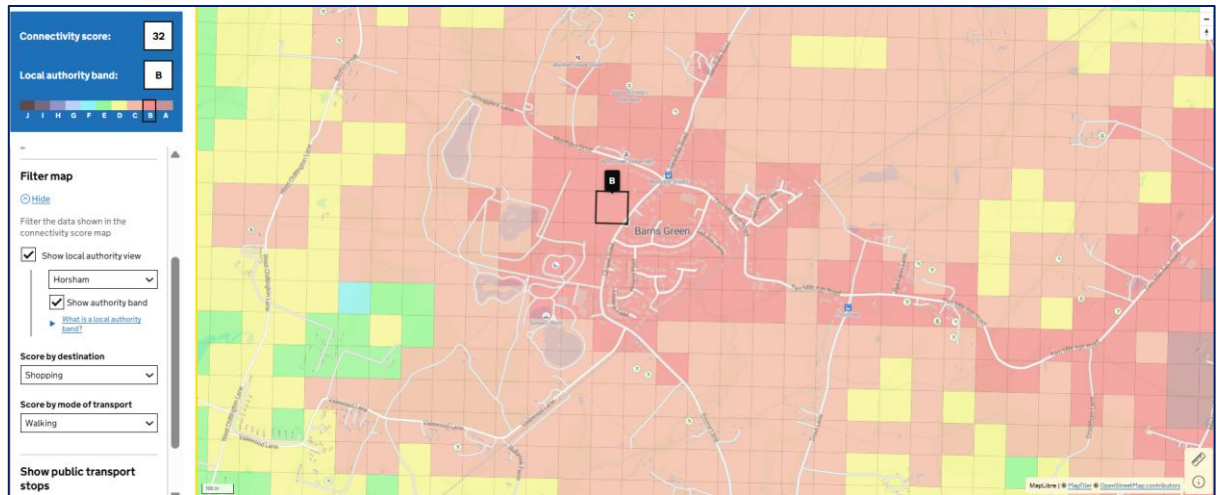
Image 2.4: Site's Local Connectivity Band (public transport/all purposes)



Source: DfT Connectivity Tool, obtained 15 June 2026

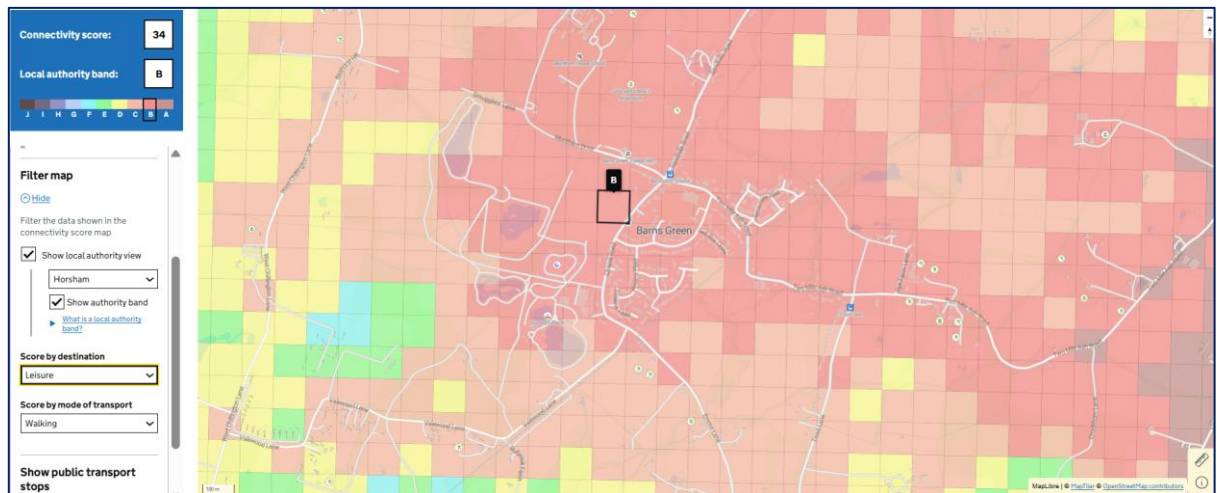
- 2.15 Further, as identified previously, the site is particularly well located to retail, leisure, and education needs, all well within walking distance. This is confirmed by use of the tool, that shows, in the context of Horsham, the site is located with connectivity banding of B for walking to each of those services (as shown in Images 2.5, 2.6, and 2.7).

Image 2.5: Site's Local Connectivity Band (walking/retail)



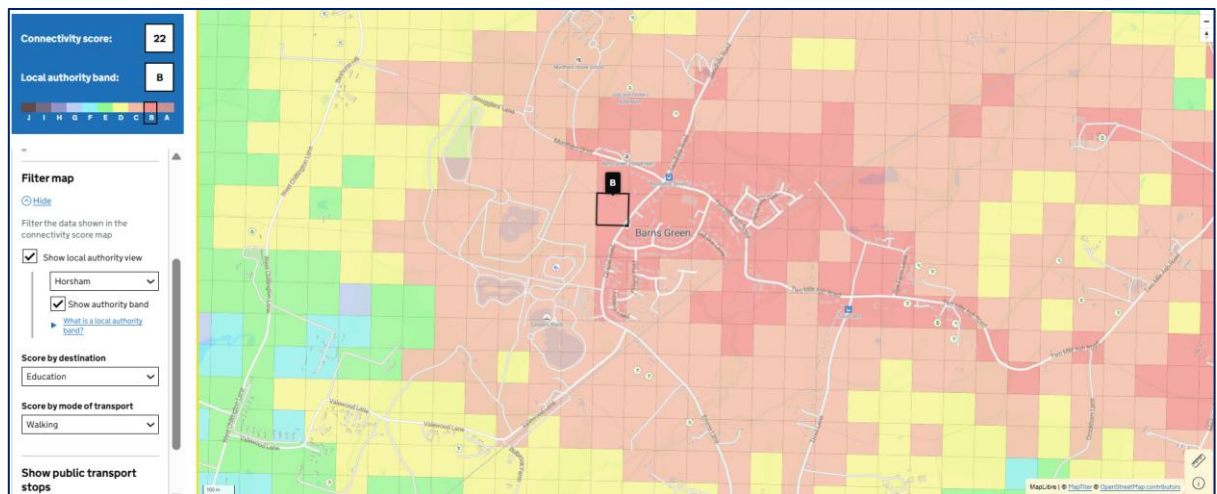
Source: DfT Connectivity Tool, obtained 15 June 2026

Image 2.6: Site's Local Connectivity Band (walking/leisure)



Source: DfT Connectivity Tool, obtained 15 June 2026

Image 2.7: Site's Local Connectivity Band (walking/education)



Source: DfT Connectivity Tool, obtained 15 June 2026

- 2.16 Therefore, considering the site's location, in the local context, the Connectivity Tool identifies it as being in one of the most highly connected locations, and where development should be directed. It is in the top 30% of the most connected locations for all journey purposes in the district, and by walking to retail, leisure, and education purposes it is in the top 20% of the most well connected places.
- 2.17 The site's access proposals are delivering a cohesive walking strategy, with footways and dedicated uncontrolled pedestrian crossings, with build-outs across Chapel Road, to ensure the site is fully integrated into the existing pedestrian network.

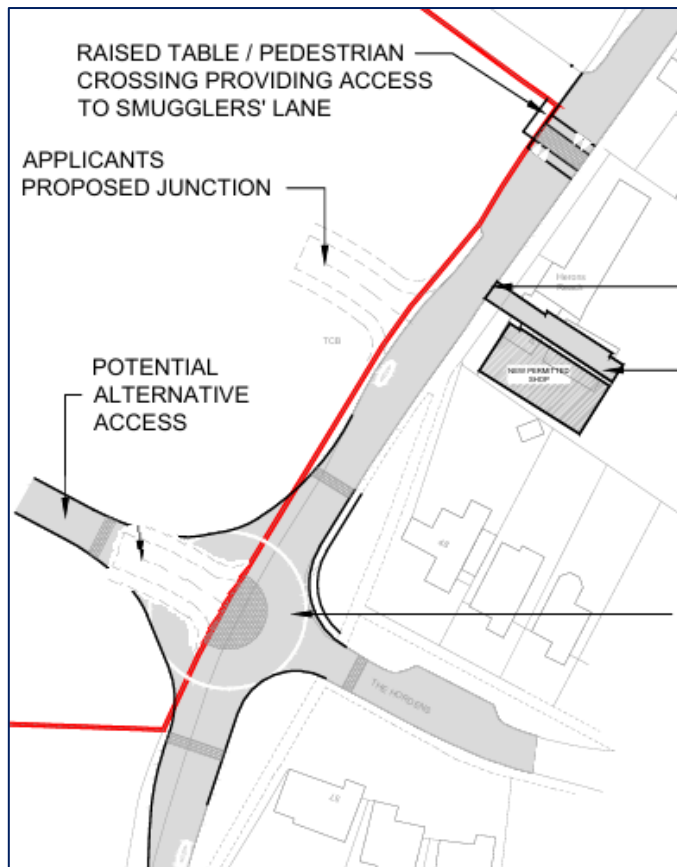
3 Site Access

- 3.1 The site access design has been developed as part of a holistic design accounting for all constraints at the site, including the need for drainage features in the south east corner of the site, the need to retain as much hedgerow as possible, and to ensure safe visibility splays for all users. The type and form of junction has also been influenced by the need to prioritise active travel users, and direct them across Chapel Road in a safe and effective location.
- 3.2 Other than moving the access within about 1m north or south, the access is located in the only place where visibility splays can be secured to meet the necessary requirements of the local highway posted speed limit (any change in speed limit cannot be secured by the planning system, it required a separate Traffic Regulation Order).
- 3.3 The proposal introduces a new simple priority junction to Chapel Road, approximately opposite the existing shop. It should be noted that the reference to a consented scheme at the shop (DC/19/2052 Herons Reach) in the JRTP report is incorrect. The planning permission from 2019 was never implemented and has now lapsed. There is therefore no extant permission in place.

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- 3.4 As part of the proposal, new dedicated pedestrian crossings are introduced, to provide identified locations for pedestrians to cross in safety (including enabling members of the existing community to safely cross Chapel Road to access the Smugglers Lane public right of way). These also act a way of demarcating the safe area for ad-hoc parking to occur on street in the vicinity of the shop.
- 3.5 As a result of feedback from the parish and other local individuals, the application is now proposing an additional formal car parking area (4no. spaces) within the site in proximity to the site access. This will enable additional parking during peak periods for visitors to the shop, public house, and / or new site. This is a material benefit of the proposal, enabling a net increase (1no. space) in the number of car parking spaces available.
- 3.6 All iterations of the site access proposal have been checked by an independent road safety auditor, and any recommendations picked up in revised layouts. Further, WSCC's own internal road safety auditors have checked the layouts and confirmed that they are suitable to provide safe access for all road users. Ultimately the safety and operation of Chapel Road is the responsibility of WSCC to implement and maintain, and therefore greatest weight should be given to their professional opinion as to whether the layout, form and location is acceptable. As is shown in their responses to the consultation, WSCC has considered the application in detail, and determined that a safe and effective access for all modes is delivered.
- 3.7 The JRTP report presents a four-arm compact roundabout to access the site from Chapel Road, forming a junction with The Hordons. The form and scale of such an access is disproportionate to the size of the development proposed – junction types form a sliding scale from a simple priority junction for small accesses, through to ghost islands, roundabouts, traffic signals, and grade separated junctions. In this instance, the smallest form of junction, a simple priority, is the most appropriate in scale and form for the proposal. Junction modelling supporting the application demonstrates it is sufficient to accommodate future demand with minimal queueing and delay. Its layout and positioning have been agreed by WSCC as appropriate to maintain the safe and effectivity operation of the highway for all users.
- 3.8 Roundabouts such as that suggested by JRTP are only necessary for much large developments. In addition, roundabouts are not favoured by cyclists (they can be “daunting” as set out in the WSCC Cycling Design Guide 2019). The type and scale of the junction (compact roundabout) suggested by JRPT is incongruous in the village – there are no other junction types like it, and it is much larger than the priority junction proposed by the applicant – a simple overlay is shown in Image 3.1. It is odd that JRTP has suggested the opposite, when the suggested compact roundabout is clearly much larger, and would have a much greater physical impact on the layout of Chapel Road, than the applicant's proposed priority junction.

- 3.9 It is therefore clear that the applicant's simple priority junction is the most appropriate location and form of junction type to ensure safe access and movement for all site users, accounting for the site's other constraints, and to ensure a scale in keeping with the village setting. It has been agreed by WSCC, and supported by an independent Stage 1 Road Safety Audit, that it enables safe and suitable access for all users, and its creation has no material impact on the operation of the local highway network.

Image 3.1: Simple Overlay of Priority Junction on Compact Roundabout



4 Summary

- 4.1 This report responds to the review undertaken by John Russell Transport Planning (JRTP) on behalf of Itchingfield Parish Council, concerning the proposed development at Land south of Smugglers Lane, Barns Green. The development proposals, supported by iTransport's Transport Assessment, Travel Plan, and associated documents, have been thoroughly assessed by West Sussex County Council (WSCC) as the Local Highway Authority.
- 4.2 WSCC has reviewed the submitted and updated information and concluded that the site is in a sustainable location and can be safely accessed by all travel modes. JRTP's critique focuses on two principal issues: the sustainability of the site's location and the form and position of the proposed access onto Chapel Road.

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- 4.3 In response, this report demonstrates that JRTP's conclusions are based on an incomplete interpretation of the Department for Transport's Connectivity Tool. While the site achieves a relatively modest score at a national level, this does not appropriately reflect its performance in a local context. When assessed relative to Horsham District, the site is within the top 30% most connected locations for all journey purposes and performs even more strongly for walking access to key services such as retail, leisure, and education.
- 4.4 The site's central village location provides immediate access to essential day-to-day services, including a shop, post office, public house, school, village hall, and community facilities, all within a short and safe walking distance. The proposed development enhances these connections through improved pedestrian infrastructure, including footways and crossing facilities on Chapel Road.
- 4.5 Regarding access, the proposed priority junction has been carefully designed to balance site constraints, maintain highway safety, and prioritise active travel. The access location is constrained by visibility requirements, existing features, and design considerations, and represents the only viable position to meet safety standards. The design has undergone independent road safety audit and has been accepted by WSCC. Additional benefits include new pedestrian crossing points and the provision of additional parking to support local facilities.

5 Conclusions

- The development site is sustainably located within its local context, with strong access to essential services by walking, consistent with the objectives of the National Planning Policy Framework.
- JRTP's reliance on national connectivity scoring without local context leads to a misleading conclusion. When assessed properly, the site performs well within Horsham District, being among the more connected locations.
- The proposals prioritise sustainable travel, particularly walking, supported by the proximity of services and the inclusion of improved pedestrian infrastructure.
- The proposed access arrangement is appropriate, safe, and policy-compliant, having been subject to detailed design, safety audits, and full review by WSCC.
- The scheme delivers tangible local benefits, including enhanced pedestrian crossings and increased parking provision to support existing village amenities.
- WSCC's professional assessment should be afforded significant weight, and its conclusion that safe and suitable access is achieved reinforces the acceptability of the proposals.
- Overall, the evidence confirms that the development accords with national and local transport policy, provides safe and effective access for all users, and represents a sustainable addition to the local area.

