

THIRD TECHNICAL SUBMISSION – HIGHWAY SAFETY MATTERS

Date: 12th June 2026

Project: Planning Application DC/25/2079 – Use of Land for the Stationing of 4 no. Static Caravans (Gypsy and Traveller Residential Purposes)

1. INTRODUCTION

- 1.1 This third Technical Submission has been produced by SK Transport Planning Limited on behalf of our client [REDACTED]. This response has been prepared following a review of the Transport Statement prepared by RGP Consulting Engineers Limited, on behalf of the applicant. This submission remains a formal objection to the development proposals.
- 1.2 This third submission draws on the technical information presented in the RGP Transport Statement, to justify both the development access strategy and the sustainable credentials of the site. The Transport Statement presents a raft of technical information on these matters, to attempt to support the development proposals.
- 1.3 The report also confirms that the A281 Horsham Road corridor is a major highly trafficked A classification road, with no provision for pedestrians. The report also confirms the high traffic volumes and the recorded vehicle speeds on the A281 Horsham Road corridor, information that should have been presented with the planning application submission.
- 1.4 Before considering the technical submission in detail, we reiterate the point previously made to HDC and WSCC Officers regarding the proposed scale of development at the site. The Transport Statement states at paragraph 1.1.2 that the development proposals comprise of:

“...the stationing of 4 caravans for residential use, forming 4 traveller pitches (one caravan per pitch), with associated vehicular access, parking and ancillary works.”

- 1.5 We are unclear why the applicant continues to choose not to acknowledge that on their submitted drawings (also included in appendix a in the Transport Statement), that the development proposals clearly show:
 - 4 no. static caravans
 - 4 no. touring caravans
 - 4 no day rooms
- 1.6 All the above residential accommodation will be accessed by the single sub-standard vehicular access onto the A281 Horsham Road, in a location which is devoid of any safe pedestrian and cycle connections or links to nearby local facilities.
- 1.7 We have also previously highlighted that the development proposals will also share the same access as the existing equestrian facility located at the site. No assessment has been made of the cumulative traffic from both uses using the existing access onto the A281, which as previously presented does raise significant concerns regarding the use of this corridor by vulnerable road users.
- 1.8 In paragraph 2.1.3 in the Transport Statement it is stated that:

“Paragraph 116 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account

all reasonable future scenarios. This is a high test and one which the modest proposals described within this statement are not considered to meet (our emphasis)."

- 1.9 Having identified that the residential development proposals are more significant in scale than presented at paragraph 1.1.2, we maintain that regardless of the scale of development, and even if the applicant's team consider these to be "modest proposals", the lack of any safe walking and cycling routes, along a busy A road is cause for significant concern, and has the potential to impact on highway safety for all road users.
- 1.10 Turning to the referenced 2024 Planning Policy for Traveller Sites (PPTS) document, whilst we are pleased that the applicant's team has referenced this document, we are concerned that the Government's aims in respect of traveller sites has not been explicitly referenced and checked against the proposed development site. As an example paragraph 4 (j) states the Government's aim is:

"to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure"

- 1.11 The importance of providing safe, accessible sites for travellers, that meet both the PPTS and the NPPF is set out in paragraph 8 in the PPTS. The document could not be clearer that the requirements of the NPPF also apply to traveller sites, with the objective being that all development should be sustainably located, and ensure safe and appropriate access for all, including the young, old, elderly and infirm can be achieved.

2. THE PROPOSED ACCESS STRATEGY

- 2.1 We note in section 3 of the Transport Statement that the applicant's team has confirmed that there is no intention for the development to deliver any physical enhancements to the existing site access, over and above some trimming back of vegetation that falls within the maintained highway boundary), to achieve suitable visibility splays in both directions. We will return to that technical point later in this submission.
- 2.2 With regard to existing traffic volumes and vehicle speeds on the A281, it is helpful for all parties to confirm that the route accommodates c.700 two-way vehicle movements in the network peak periods, and that on a typical weekday the corridor accommodates c.8,600 vehicles.
- 2.3 To put that into context, in each of the network AM and PM peak periods the corridor has an average of 11.6 vehicles passing the site access each minute. The additional vehicle movements generated by the proposed development, as well as existing vehicle movements associated with the equestrian facility will have to negotiate these significant traffic flows when joining/leaving the A281 Horsham corridor.
- 2.4 A detailed review of the Personal Injury Collision (PIC) data is also revealing. The dataset confirms that there is a high proportion of loss of control/overtaking collisions, but the Transport Statement focuses on the lack of collisions from the existing vehicular access, and that there is no collision pattern attributable to vehicle movements turning into or out of accesses.
- 2.5 What the PIC data does confirm is as follows:
 - all of the four recorded collisions took place during daylight hours, when the weather was considered to be fine and dry
 - three of the four collisions were recorded as the result of overtaking manoeuvres on the section of A281 chosen for assessment by the applicant's team
 - of these three collisions, two resulted in multi-vehicle collisions where drivers appear to have misjudged the speeds of other vehicles (either travelling in the same direction, or as oncoming traffic)

- one of the recorded collisions was the result of black ice on the carriageway, resulting in the driver losing control of their vehicle and colliding with a tree
- 2.6 Based on a more detailed review of the PIC data, there is evidence of a pattern of overtaking collisions resulting in drivers not judging the speed of other vehicles, either travelling in the same direction or as oncoming traffic.
- 2.7 This is an important technical point that we refer back to later in this response, when considering both the required visibility splays when exiting the development site access, as well as the forward visibility required for drivers travelling north and having appropriate stopping distance for any right turning vehicles into the development site.

Visibility Splay Requirements

- 2.8 In section 5.3 of the Transport Statement it is stated in paragraphs 5.3.1 and 5.3.2 that:

“Visibility splays at the existing vehicular access have been assessed in accordance with the principles set out in Manual for Streets (MfS). MfS is the relevant design standard for residential accesses, and is the standard to which the WSCC Developer Guidance Notes defer for the purposes of residential access design.

It is appropriate to consider the Stopping Sight Distance (SSD) calculation set out in Manual for Streets and not DMRB, given that the A281 is not a Trunk Road. It is also notable that ‘Manual for Streets 2 – A Wider Application of the Principles’ (MfS2), provides clarification on the most appropriate visibility splay guidance to use. Paragraph 1.3.2 of MfS2 states:

“As a starting point for any scheme affecting non-trunk roads, designers should start with MfS.”

- 2.9 It is unfortunate that the applicant’s consultant has failed to reference paragraph 1.3.6 in Manual for Streets 2 (MfS2), which goes on to state:

“Where a single carriageway street with on-street parking and direct frontage access is subject to a 40mph speed limit, its place characteristics are more of a residential street or high street, with higher traffic flows, and may result in actual speeds below the limit. It is only where actual speeds are above 40mph for significant periods of the day that DMRB parameters for SSD are recommended. Where speeds are lower, MfS parameters are recommended (our emphasis). Where there is some doubt as to which guidance to adopt, actual speed measurements should be undertaken to determine which is most appropriate.”

- 2.10 We know from the speed survey data presented in appendix b in the applicant’s Transport Statement that in every single hour when the 85th percentile speed is calculated, and in each direction across the seven day survey period the 85th percentile speeds are in excess of 40mph.
- 2.11 Based on the applicant’s own dataset, and the recommendation in MfS2 paragraph 1.3.6 it is clear that DMRB parameters should be used to calculate the SSD, not MfS SSD guidance.
- 2.12 This technical point does, unfortunately mean that the applicant’s SSD distance calculations presented in section 5.3 in the Transport Statement are not applicable to either calculate the visibility splay requirements when emerging from the site access onto the A281 Horsham Road, or the forward visibility for drivers when travelling along this route.
- 2.13 As a footnote, it is also noted that in paragraph 5.3.4 an attempt has been made to reduce the 85th percentile speeds to a wet weather equivalent MfS SSD value. Whilst a wet weather adjustment allowance is mentioned in MfS2 (published in 2010), this was at the time when TA 22/81 “Vehicle

Speed Measurement on All Purpose Roads” was still applicable, which also allowed a wet weather factor to be applied. The publication of CA 185 “Vehicle Speed Measurement” in 2019 replaced TA22/81, and makes no allowance or recommendation for wet weather adjusted speeds.

- 2.14 Based on the above information the correct approach to calculate the required visibility splays is to apply DMRB parameters, as the recorded 85th percentile speeds in both the northbound and southbound directions on the A281 Horsham Road are significantly greater than 40mph in all surveyed hours/time periods.
- 2.15 To assist both the applicant and Officers, the calculated speeds set out in paragraph 5.3.4 in the Transport Statement (44.2mph northbound and 44.0mph southbound) place the speeds within the 85kph design band speed. An 85kph design speed requires a desirable minimum SSD of 160m, as set out in table 2.10 in CD109 “Highway Link Design”.
- 2.16 In comparison the Transport Statement presents a MfS led solution, which looks to deliver visibility splays of 75.7m to the north and 76.2m to the south of the site access. These dimensions are less than 50% of the desirable minimum 160m SSD set out in CD109, and c.45m short of the 120m “one step below desirable minimum” SSD also presented in the same document.
- 2.17 In summary we highlight that the proposed visibility splays in the applicant’s Transport Statement have been calculated using the incorrect design standards. The 160m “desirable minimum” and 120m “one step below desirable minimum” SSD values should be applied to both the access visibility splays and the forward visibility for northbound traffic approaching a stationary vehicle turning right from the A281 Horsham Road into the development site.
- 2.18 We request that any additional technical drawings should also consider the deliverability of the splays and forward visibility in the vertical plane, showing the visibility splay envelope and achievable visibility from the correct driver eye height to the recommended minimum/maximum object heights. These drawings will need to consider any changes in height, obstructions and vegetation in verges.
- 2.19 As previously presented to Planning and Highways Officers, we continue to raise concerns that appropriate visibility cannot be provided at the site access, or appropriate DMRB forward visibility when approaching the junction from the south. Site visits have also confirmed that achieving appropriate DMRB forward visibility is compromised by changes in levels and vegetation, meaning that the required forward and intervisibility cannot be achieved in this location.

3. SUSTAINABLE ACCESS ASSESSMENT

- 3.1 Our previous submissions have confirmed that the development site is located outside of the built-up area of Cowfold and within the Countryside. Site visits have confirmed that there will be significant reliance on the private car to make any trips to and from this residential development.
- 3.2 The December 2025 Planning Statement confirms the remoteness of the site, stating:

“While there is no footpath along Horsham Road (A281), neither Policy 23 HDPF (2015), Strategic Policy 43 HDLP (reg 19) (2024), nor the provisions of the PPTS (2024) explicitly require gypsy and traveller sites to be located within reasonable walking and cycling distance of a town or village.”

- 3.3 Whilst in local policy there may not be any explicit requirement for gypsy and traveller sites to be located within reasonable walking and cycling distance of a town or village, we have previously highlighted to the applicant and HDC and WSCC Officers that the application site location means there are no safe pedestrian routes for the end occupiers to access the local facilities in Cowfold, and that families, including young children cannot be expected to walk along a live carriageway to access local facilities in the village.
- 3.4 Accordingly there will be a high reliance on the private car to make both short and longer distance trips, and all of these vehicle movements will route to/from the existing unmodified access to/from the A281.
- 3.5 We have previously highlighted the requirements of the NPPF, in particular Paragraphs 110, 115, 116 and 117. It is certainly challenging to see how the residential scheme submitted to the Council

meets the requirements of Paragraph 117, being devoid of any opportunities for end occupiers to safely walk and cycle to and from the site.

- 3.6 The submitted Transport Statement attempts to present an overly positive assessment of the site's accessibility by sustainable travel modes of travel. Using the DfT connectivity tool the applicant's team presents an assessment of the site's relative performance of its accessibility on foot, cycle, public transport and by private car, compared to other locations in Horsham district.
- 3.7 The site's connectivity tool output is provided in appendix d in the Transport Statement, and the "overall" site assessment scores are as follows:

- Overall (expect driving) – 29 Score
- Public Transport – 34 Score
- Walking – 20 Score
- Cycling – 40 Score
- Driving – 75 Score

- 3.8 To fully understand the connectivity scores, these values need to be compared to the DfT connectivity matrices. For ease of reference these matrices are presented overleaf.
- 3.9 Paragraph 4.2.4 in the Transport Statement presents the applicant's teams assessment of the site. The report states:

"The Connectivity Tool outputs demonstrate that the site has genuinely good connectivity by private vehicle (overall driving score of 75 — High; residential driving score of 85 — Very High) and a slightly above average score for residential cycling (52). The cycling, public transport and overall scores reflect the site's rural setting where, in absolute terms, the density of services and the frequency of public transport are necessarily lower than in urban locations."

- 3.10 We consider this statement is misleading when considering the site's sustainable credentials. Placing positive emphasis on high driving scores confirms the high reliance that end occupiers of the proposed residential development will have on the private car to travel to and from the site. It is more appropriate to consider the scores for walking, cycling and public transport to understand how accessible the site is, relative to other locations.
- 3.11 The "overall" scores for these modes are presented below, along with their percentile banding taken from DfT Table B provided overleaf:

- Overall (expect driving) – 29 Score = lowest percentile band (<10% percentile)
- Public Transport – 34 Score = lowest percentile band (<10% percentile)
- Walking – 20 Score = lowest percentile band (<10% percentile)
- Cycling – 40 Score = lowest percentile band (<10% percentile)
- Driving – 75 Score = second lowest percentile band (10% to 20% percentile)

- 3.12 The "overall" connectivity scores confirm that in terms of accessing the site on foot, cycle and by public transport the site falls into the lowest percentile bands, confirming that the site falls into the bottom 10% percentile band, when considered against all other locations in England and Wales.
- 3.13 This is also borne out in the DfT connectivity output in appendix d in the Transport Statement, which confirms in the National Distribution column that the site has "low", "very low" and "below average" scores in all walking, cycling and public transport assessments (including journeys to education,

leisure, health, shopping, other residential and workplaces), apart from the single cycling assessment to other residential development (a score of 52).

- 3.14 The applicant's own assessment confirms that the site performs poorly compared to other locations across England and Wales, particularly when considering accessibility on foot, cycle and public transport.
- 3.15 The findings from the DfT connectivity tool are not surprising. With the A281 Horsham Road lacking footways, and with the corridor being a classified road with a 60mph speed limit, this corridor is not considered to be an attractive or safe route for pedestrians and cyclists of all ages and physical abilities to use.
- 3.16 Based on this assessment, alongside the traffic flow and speed survey data presented in the applicant's Transport Assessment we maintain our professional opinion that the site is poorly located to allow safe access to education, leisure, health facilities, shopping, other residential development and places of work on foot and by cycle.

Table A: By destination

	Overall	Education	Leisure	Health	Shopping	Residential	Workplaces
10th percentile	38.9	34.1	37.8	25.9	38.1	45.6	36.9
20th percentile	52.1	47.0	48.7	43.1	56.5	55.2	45.9
30th percentile	58.6	55.1	54.9	51.1	64.9	60.5	51.0
40th percentile	63.1	60.6	59.6	56.9	70.6	64.3	54.7
Median	66.8	65.0	63.6	61.7	75.2	67.3	58.0
60th percentile	70.2	68.9	67.5	66.1	79.3	70.2	61.1
70th percentile	73.7	72.8	71.7	70.3	83.4	73.5	64.4
80th percentile	77.8	77.1	76.8	74.9	87.4	77.4	69.1
90th percentile	83.2	82.7	83.3	80.6	91.6	84.6	78.8

Table B: By mode of transport

	Overall	Walking	Cycling	Public transport	Driving
10th percentile	38.9	33.7	48.4	40.7	74.6
20th percentile	52.1	48.0	58.1	53.5	79.8
30th percentile	58.6	55.5	63.1	59.7	82.6
40th percentile	63.1	60.7	66.7	64.2	84.5
Median	66.8	64.8	69.7	67.8	86.2
60th percentile	70.2	68.5	72.5	71.2	87.6
70th percentile	73.7	72.1	75.5	74.7	89.0
80th percentile	77.8	76.3	78.7	79.0	90.6
90th percentile	83.2	81.6	83.6	85.3	92.5

Figure 3.1: DfT Connectivity Tool Matrices – Destination and Mode of Transport

4. CONCLUSIONS

- 4.1 Based on the additional technical information provided by the applicant's team in the submitted Transport Statement, as well as the raft of evidence that we have previously submitted it remains our professional opinion that allowing residential development in this location, which is devoid of any practical, safe routes for end occupiers to travel by means other than the private car is not compatible with the requirements of the National Planning Policy Framework (NPPF).
- 4.2 As a reminder, paragraph 116 in the NPPF states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."
- 4.3 The development proposals will result in residential accommodation being located in a wholly unsustainable location, where there are no opportunities for end occupiers to safely walk to and from the site to the nearest village, to local facilities, shops, education and places of work. This is borne out in the DfT connectivity tool assessment submitted by the applicant.
- 4.4 It has previously been confirmed that it is not possible for the applicant to deliver appropriate junction visibility splays without a reliance on third party land. Forward visibility is also substandard on the northbound approach to the development access point.
- 4.5 The submitted Transport Statement incorrectly applies a MfS assessment of the required visibility splays at the existing unmodified site access. We have confirmed that when 85th percentile speeds are greater than 40mph, as reported in the Transport Statement, DMRB SSD requirements should be applied.
- 4.6 For the recorded vehicle speeds this requires both access and forward visibility SSD of 160m (the "desirable minimum") to be provided. In contrast the visibility splays presented in the Transport Statement are c.45m shorter than the "one step below desirable minimum" 120m SSD value.
- 4.7 With regard to a servicing strategy for the site, the Transport Statement confirms that it is the intention that refuse collection will take place from the public highway, with the justification being that this is what happens at other locations/properties along the A281 Horsham Road corridor. We note that the Council's Waste Services team has responded on this matter, confirming that the refuse vehicle will have to stop on the Horsham Road corridor, as there is no appropriate space to turn the refuse vehicle within the site.
- 4.8 As highlighted earlier in this submission, the refuse vehicle will have to service from the A281 Horsham Road corridor, in a location which has been evidenced as not having appropriate intervisibility for highway users, on an unlit A classification road which accommodates c.8,600 vehicles on a typical weekday. We do not consider this to be an appropriate or safe proposal, based on the review of vehicle speeds and volumes on this corridor, along with the visibility splays proposed by the applicant that have been shown to be significantly below the required DMRB standards.
- 4.9 The technical point regarding the actual scale of proposed residential development, which we understand will be occupied alongside the existing equestrian use on the wider site has also not been considered. Our concern remains that there will be an increase in vehicle movements turning into/out of the access to/from the A281 Horsham Road, which in turn increases the likelihood of vehicles having to wait on this 60mph classified road, where the proposed Stopping Sight Distances are significantly lower than DMRB requirements for the recorded speeds on this corridor.
- 4.10 Based on the technical information contained in this submission there is clear and unchallengeable evidence that the proposals will have an unacceptable impact on highway safety, for end occupiers of the proposed development, and users of the A281 Horsham Road corridor.
- 4.11 We trust that this third submission assists HDC and WSCC Officers in considering their position on the application presented to them, and allows them to understand the adverse highway safety risks that granting planning permission could generate for both end occupiers of the proposed development, and other highway users on the A281 corridor.
- 4.12 If Officers would like to discuss the technical information contained within this submission we would be pleased to arrange a meeting to discuss these matters.



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