

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Mid Sussex District Council FAO: Steve King
FROM:	WSCC – Highways Authority
DATE:	25 February 2025
LOCATION:	Land West Of Turners Hill Road And South Of Huntsland Turners Hill Road Crawley Down West Sussex
SUBJECT:	DM/25/0014 Outline planning application (appearance, landscaping, layout and scale reserved) for the erection of up to 200 dwellings, and associated infrastructure including new access points off of Turners Hill Road with associated spine roads and car and cycle parking; the provision of open space and associated play facilities; utilities infrastructure, surface water drainage features, and associated features, on land west of Turners Hill Road and south of Huntsland, Crawley Down, West Sussex.
DATE OF SITE VISIT:	13 th February 2025
RECOMMENDATION:	Advice

1. Comments are made in respects of,
 - Transport Assessment, reference MS/LJ/MS/ITB9155-052D, dated 15th January 2025
 - Travel Plan, reference MS/SG/ITB9155-055C
 - Proposed Southern Site Access Priority Junction, drawing ITB9155-GA-029 revision I
 - Proposed Central Site Access Priority Junction, drawing ITB9155-GA-038 revision G
 - Illustrative Master Plan, drawing number SK001-01 revision V14
 - Access and Movement Parameter Plan, drawing, number 008-04 revision C
2. It's recognised that duplicate applications have been submitted for both the northern and southern parcels. For the purposes of the duplicate applications, identical comments are issued by WSCC Highways for the respective duplicate southern and northern planning applications.
3. Given the northern and southern parcels form a single allocation within the Mid Sussex Local Plan, certain aspects of the proposals have been considered cumulatively. As appropriate, site wide comments covering both the northern and southern planning applications are made against respective elements. These comments remain the same for all planning applications.

Access

4. There are two land parcels forming part of the current planning application (comprising fields 3, 4, 5, 6 and 7 as shown on the Illustrative Masterplan) providing a total of 200 dwellings. Separate vehicular accesses are proposed for those parcels within field 5 and fields 3, 4, 6 and 7.
5. With regards to the parcel formed by fields 3, 4, 6 and 7, these will provide up to 150 dwellings. Access is proposed via a simple 6-metre-wide priority junction onto the B2028 Turners Hill Road, which in this location is subject to a 30mph speed limit. It's noted that there is an existing field gate access in the same position as the proposed access. The proposed access forms a very slightly staggered crossroad arrangement with Vicarage Road opposite. Details of the proposed access are shown on drawing ITB9155-GA-029 revision I.
6. For the purposes of the access design further information would be requested to address the following,
7. It's accepted that the visibility splays/stopping sight distances shown at the proposed junction are based on recorded 85th percentile speeds. The raw speed survey data should though be provided as part of the current planning application. This data should include information concerning the location of the speed survey and weather conditions at the time of the survey.
8. A Stage One Road Safety Audit needs also to be provided for the proposed simple priority junction with signalised crossing arrangement. Whilst Stage One RSA's are provided, none cover the situation as presented. The inclusion of the signalled controlled crossing is not considered as a minor update as referenced in 5.2.5 of the submitted TA.
9. Detailed comments were also made by the WSCC Traffic Signals team concerning the proposed signalised crossing as part of the pre-application discussions. Some of these points may well have been addressed through the revised scheme, however no commentary has been provided covering these matters. These comments are repeated below. The Applicant would be requested to provide responses,
 - A crossing should be located a minimum of 20m from a conflict point with a side road; at this location, the point at which vehicles exiting Vicarage Road and turning left, conflict with Turner Hills Road, appears to be less than this. Could it be clarified please?
 - There is a comment on the drawing stating the width behind a signal pole of 0.79m. This distance is substandard; the absolute minimum required is 1.2m, however our preferred minimum is 1.5m to enable wheelchairs/pushchairs to safely pass.
 - Looking at this location on Google Street View, there are a number of established trees which have the potential to impact approaching driver & waiting pedestrian visibility. A green man is only an invitation to begin crossing, and pedestrians should be able to see the approaches clearly; anyone crossing from West to East may have challenges observing southbound traffic flow.

- Every signalised crossing requires street lighting, and there does not appear to be suitable locations to install lighting columns. This would need to be checked with the authorities PFI provider, to ensure the proposed crossing can be suitably lit.
- At this stage, it is important to identify the proposed location for the signals controller and location for a maintenance bay. Normally this is something that would be defined during the detailed design stage, however given the site constraints, it is important to clearly establish these as early as possible, to ensure the proposals are suitable.

10. The design also includes a length of shared use foot/cycle way along the development access road. This stops abruptly at the junction with the B2028. Through pre-application discussions, WSCC Highways has highlighted concerns with this arrangement given the lack of onward connectivity; ending the route at the very busy B2028 would not be appropriate. Continuity for the route for cyclists across the B2028 and then into Crawley Down village to a reasonable point must form part of the design.

11. Field 5 provides access for 50 dwellings. Again, a simple 5.5-metre-wide priority junction is proposed onto the B2028 Turners Hill Road. Details are shown on drawing number ITB9155-GA-038 revision G. There are a number of points concerning the access.

12. It's accepted that the visibility splays/stopping sight distances shown at the proposed junction are based on recorded 85th percentile speeds. The raw speed survey data should though be provided as part of the current planning application.

13. The design also includes a length of shared use foot/cycle way along the development access road. This stops abruptly at the junction with the B2028 with the drawing implying that cyclist rejoin the carriageway. Through pre-application discussions, WSCC Highways has highlighted concerns with this arrangement given the lack of onward connectivity; ending the route at the very busy B2028 would not be appropriate. Continuity for the route for cyclists across the B2028 and then into Crawley Down village to a reasonable point must form part of the design.

14. The submitted Stage One RSA is relevant for the design shown on the latest drawing revision. An editable version of the RSA response should be provided to WSCC to enable comments to be added to the Overseeing Organisation and Agreed Actions sections. It's suggested that the RSA Response is agreed between the Applicant and WSCC, and the agreed version then submitted for the planning file.

15. In commenting on the vehicular access proposals, WSCC acknowledge the detailed pre-application comments previously made. It's apparent that there are issues to be resolved.

Active Travel (including bus and travel plan)

16. The linear nature of the site is acknowledged as influencing distances and journey times to nearby destinations. It's important to note that comments

here relate to active travel (walking, cycling, and access to bus services) for the both the northern and southern parcels of development.

17. The TA also refers to bus frequency enhancements covering Saturday and Sunday evenings having been agreed for the 272 with Metrobus. WSCC endorse any service enhancement albeit this has been privately negotiated for an existing commercial service. Any s106 obligation would therefore be upon the Applicant to enhance the service frequency as set out in the TA rather than make any contribution towards WSCC. It's accepted that the s106 may still include a capped figure to provide certainty of costs to the Applicant.
18. The complication with this obligation is that the service enhancement has been agreed on the basis of the whole draft allocation that has now been split between two planning applications. The Applicant would need to clearly set out how the enhancement will be secured in light of this. The suggested 50/50 contribution split between the two planning applications raises potential issues of long-term viability or service continuity should both applications not come forward in a timely way.
19. In terms of wider connectivity to Crawley Down, an assessment of walking/cycling routes was undertaken as part of pre application discussion (referred to within 4.6.1 of the TA). The details of this assessment haven't been submitted with the TA. Nevertheless, the assessment identified opportunities for various improvements and these are listed in 4.6.4 of the TA. Further details of the improvements are shown on drawing ITB9155-GA-056 revision A (Off Site Pedestrian/Cyclist Improvements). These improvements relate to both the planning applications covering the northern and southern parcels. The improvements will need to be appropriately allocated to one or other parcel in terms of relevance and need.
20. In terms of the detailed schemes presented on ITB9155-GA-056 revision A, the following comments would be offered,
21. The proposed crossing point on Vicarage Road is such that pedestrians crossing from the north to south wouldn't be able to see vehicles turning into the junction. There is also no footway on the southern side of Vicarage Road for a crossing point to land into. Whilst desirable to keep a crossing on the shortest possible desire line, this may not be possible in this instance.
22. The pedestrian crossing point on Grange Road is placed at the widest point at the junction. This will result in pedestrians crossing a significant expanse of carriageway. It may be necessary to inset the crossing away from the junction.
23. No improvements have been identified to footways along the B2028. There is the expectation for increased pedestrian activity along the existing footway on the eastern side of the carriageway. This is narrow in places due to the grass verge encroaching. Whilst highway maintenance is the responsibility of WSCC, the current application has the potential to increase activity and as such there would be merit to the Applicant committing to a simple scheme of verge clearance/footway widening.

24. The improvement to the northbound bus stop south of Grange Road doesn't appear to account for the existing vehicular crossovers. The existing vehicular accesses should be plotted onto the drawing.
25. It should be noted that WSCC do not adopt or maintain bus shelters. An agreement would need to be reached with a 3rd party to take on responsibility for these. The design of the shelters would also need to be agreed with the adopting 3rd party.
26. As a general point, the absence of any consideration for potential cycling improvements towards the village centre other than along Worth Way is notable. This matter was raised as part of pre-application discussions. WSCC acknowledge that significant improvements in accordance with the principles in LTN 1/20 will not be achievable within the extents of the existing highway but some consideration needs to be provided. As highlighted by WSCC through pre application discussions, the presence of a 30mph speed limit does not mean that all routes are appropriate for cycling by default.
27. The Applicant should acknowledge that any physical improvement schemes will need to be delivered as schemes of works rather than contributions to WSCC. Exceptions to this include those works to the Worth Way and the bus service enhancement.
28. With regards to Worth Way, the Applicant should note that this does not form part of the adopted highway network nor is a public right of way (it is not a bridleway as indicated within the TA); WSCC are though the landowner. In light of this any works or contributions to Worth Way, would need to be agreed with WSCC as landowner. These are not matters that would be agreed with WSCC Highways.
29. As required by the National Planning Policy Framework, a travel plan has also been submitted. This has been reviewed and the following comments would be offered.
- 4.2.1 – A degree of caution should be used with the 2021 Census given this was undertaken when the COVID Pandemic was very much influencing travel habits.
 - 4.2.3 – For reasons stated above and in connection with the 'vision led' approach, using the 2021 Census as a baseline to inform future targets is not appropriate; this approach very much reflects the 'predict and provide' approach that 'vision led' planning is seeking to move away from. Any targets should not be based upon existing travel characteristics.
 - 7.3.2 – The car club will need to be secured via a separate s106 obligation. A suitable trigger point will need to be agreed for this. This will need to include details of the car club location/s.
 - 10.2.1 – WSCC cannot accept monitoring simply by way of travel questionnaires. From experience, response rates even with incentives are generally poor and do not provide an accurate representation of travel.

Given also the target is to reduce vehicular trip generation, travel questionnaires may not provide a means of recording the relevant information.

- 10.2.4 – Given the comment above, the inclusion of reference to having to redo surveys further raises the expectation that these are unlikely to generate the required response rates. An alternate means of monitoring must be included.

Vehicle Trip Generation and Highway Capacity

30. The TA provides the conclusions of the highway capacity assessment with it noted that this is based on 350 dwellings (i.e. the total number of units within the northern and southern planning applications). It's further recognised that the scheme is not anticipated to result in any severe or unacceptable impacts upon the operation of those junctions within the study area. The approach to highway modelling was agreed with WSCC Highways through pre-application discussions. For transparency, the background work should be presented with the TA for the public file.

31. The TA also includes 'vision led' scenario. This approach is required within the National Planning Policy Framework and encourages developers to introduce measures and proactively try to influence how residents choose to travel. The purpose of the 'vision led' approach is not to look at existing travel trends (e.g. by using Census data) and simply seek to replicate these for the proposed development.

32. It's accepted that different areas will require different 'vision led' approaches, and in turn have different outcomes. The key aspects of the approach nevertheless include the setting of clear transport interventions, targets, monitoring to ensure targets are met, and a scheme of proportionate remedial actions to be implemented should targets be missed.

33. For the purposes of the current application, a 10% trip reduction is being applied by way of the travel plan. Whilst a 10% target is not unacceptable, the concern is that this is being based upon baseline travel characteristics with these taken from Census 2021 data (4.2.3 of the Travel Plan). Using existing data in this way is not appropriate for the 'vision led' approach. As already noted, it is widely acknowledged that the Census 2021 travel outputs will have been heavily influenced by the COVID pandemic and travel restrictions in place at that time. The Applicant will need to revisit their suggested 'vision led' approach. It's further recommended that this approach is embedded within the travel plan with this document setting out the monitoring and remedial actions.

Layout

34. Matters relating to the on-site layout of roads and footways are not being approved at this stage. It would though be expected for general design principles to be established and secured either within the Design and Access Statement or on the Access and Movement Parameter Plan. The DAS itself includes very high-level design principles for on-site roads and footways but doesn't include any level of detail concerning hierarchies or parameters that

can then follow into the detail design. It's suggested that the DAS is updated to include more detailed design parameters.

35. With regards to the Access and Movement Parameter Plan, a key aspect missing is the north-south foot/cycle route that links to right of way 33W and Worth Way. This link will also connect into the northern parcels that are subject to a separate planning application. The indicative alignment of this route should be included on the Parameter Plan.
36. Details of other external pedestrian/cyclist connections would be expected as part of any subsequent reserved matters application.

Other Matters

37. A scheme of traffic management works is shown drawings ITB9155-GA-066a, 67A, and 68A for the B2028. The scheme presented includes 30mph roundels on the carriageway along with 'islands' of coloured surfacing. It's understood that the details reflect a scheme implemented on the B2133 through Loxwood. For the purposes of the proposed scheme, WSCC understands that there are aspirations within the Crawley Down Parish Council Neighbourhood Plan concerning traffic calming on the B2028.
38. WSCC would request details of what the scheme seeks to achieve. Unlike the B2133 in Loxwood, the B2028 also includes street lighting. The Applicant should note that roundels or any other 30mph speed limit repeater signage wouldn't be permitted based on the Traffic Signs Regulations and General Directions.

Conclusions

39. There are a number of matters contained within the response above that the Applicant would need to address in respects of this application. WSCC Highways will provide further formal recommendations once this additional information has been provided.

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