1.0 INTRODUCTION

1.1 This report is prepared in relation to planning application reference DC/26/0933 that seeks permission for a proposed development of 31 dwellings ('the Proposed Development') on Land Between Muntham Drive and Smugglers' Lane Barns Green, Horsham ('the Site').

1.2 This report considers the following topics:

- Relevant Transport Policy;
- Connectivity to facilities and amenities;
- Highway Access; and
- The completeness of the Transport Assessment having regard to current national planning policy.

1.3 A summary and conclusion is provided at the end of this report, which is that as submitted, the proposals have not demonstrated provide safe and suitable access for all users and is inconsistent with the objectives of the NPPF to promote sustainable development and safeguard highway safety having regard to reasonable future, cumulative scenarios.

2.0 TRANSPORT PLANNING POLICY

2.1 The Government's planning policies for England are set out in the National Planning Policy Framework (NPPF), published in August 2026. The NPPF places clear emphasis on the integration of land-use and transport planning and requires the transport implications of development to be properly understood, including its impacts in combination with other development and during both the construction and operational phases.

2.2 It is noted that the planning application was submitted prior to the August 2026 NPPF coming into force. It is expected that the applicant will be providing an addendum dealing with the changes in planning policy.

2.3 The relevant transport policies are set out below.

Policy TR3: Locating Development in Sustainable Locations

2.4 Policy TR3 establishes the principles that should guide the location of development. In particular, development should be located so that it supports sustainable patterns of movement, provides good accessibility for different users and makes effective use of existing and proposed transport infrastructure stating:

1. So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure,

development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location:

a. Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are sustainable (or which can be made so, taking into account planned improvements including any provided for as part of the development itself). This means that the location should limit the need to travel, particularly by car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical;

b. Opportunities should be taken to utilise existing or proposed transport infrastructure in optimising the amount or density of development which can be accommodated in different locations, especially where this can support more walking, wheeling, cycling and public transport use;

c. The environmental impacts of traffic and transport infrastructure should be identified, assessed and taken into account – including taking opportunities to avoid or mitigate any adverse environmental effects, and to secure net environmental gains such as reductions in air pollution;

d. In rural areas, opportunities to improve wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed.

2. The Connectivity Tool (Connectivity Tool - GOV.UK) should be used alongside other relevant evidence in assessing the connectivity of particular locations proposed for development.

2.5 The NPPF glossary defines sustainable transport modes as:

"Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking, wheeling, cycling and public transport."

2.6 It is noteworthy that this definition does not include electric vehicles. This reflects the Government's increased emphasis on walking, wheeling, cycling and public transport and its desire in particular to reduce the need to travel by car.

Policy TR6: Assessing Transport Impacts

2.7 Policy TR6 sets out specific requirements for the assessment of transport impacts. Where development is likely to generate significant amounts of movement, it requires the proposal to be supported by a proportionate transport statement or transport assessment and a travel plan.

2.8 Importantly, TR6(3) requires the assessment of movement patterns and potential impacts to consider reasonable future scenarios, including cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel.

2.9 TR6(4) further provides that development proposals **should be refused** where they would have a severe adverse impact on the transport network or an unacceptable impact on highway safety, taking into

account mitigation and wider network improvements. Critically, the policy expressly states that this applies both during the construction phase and following completion.

2.10 These requirements are important in the context of the Proposed Development. The transport impacts of the Proposed Development cannot properly be understood by considering the application in isolation from the other development that is either already permitted or planned and therefore reasonably foreseeable in the surrounding area.

2.11 A policy compliant transport assessment must consider, amongst other matters:

- the existing transport network and its current operation;
- the permitted Herons Reach development and its associated highway changes;
- the reasonable scenario of adjacent and nearby local plan allocations coming forward in addition to the Proposed Development;
- multimodal trip generation and the implications for walking, wheeling, cycling and public transport, as well as private vehicle movements;
- the impacts of development traffic at relevant times of day and on the wider highway network; and
- the impacts arising during the construction phase, including construction traffic, vehicle movements, deliveries and highway safety.

2.12 The requirements of TR6(3) are not satisfied simply by demonstrating that the highway network can accommodate the additional traffic generated by the Proposed Development considered as a stand-alone development. The assessment must address the reasonable future transport scenario, including cumulative development and multimodal trip generation.

2.13 Similarly, TR6(4) requires consideration of impacts during construction as well as following completion. An assessment which contains no assessment of construction impacts cannot demonstrate compliance with this requirement. Given the prescriptive nature of Policy TR6(4), absent an assessment of construction impacts, the planning authority is required to refuse planning permission.

3.0 SUSTAINABLE TRANSPORT CONNECTIVITY

3.1 The Department for Transport (DfT) Connectivity Tool provides a publicly accessible, scores-based view of the Department's national connectivity metric. It indicates how well locations are connected to everyday destinations by walking, cycling and public transport, allowing an assessment of sustainable transport accessibility.

3.2 It is an NPPF policy requirement at TR3(2) to utilise the tool to understand the connectivity of a site.

3.3 The tool assists practitioners in assessing the connectivity of locations across England and Wales. It enables users to:

- display how any location is connected to everyday services by walking, cycling, driving and public transport; and

- model potential new transport routes in order to understand how such interventions could affect overall connectivity.

3.4 The DfT model identifies a basket of destinations that people may reasonably need to access in their daily lives. These destinations fall within the following broad categories:

- education;
- leisure and community facilities;
- employment;
- healthcare;
- shopping; and
- social visits.

3.5 It should be noted that the Connectivity Tool does not assess the quality of routes used to access destinations. For example, there is currently insufficient nationwide data regarding factors such as pavement quality, lighting, perceived safety, or the suitability of cycling infrastructure. In the case of cycling, the tool assesses distance only, rather than the safety or attractiveness of the route. In practice, these qualitative factors can significantly influence whether people choose to travel by active modes. The Connectivity Tool therefore 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.

3.6 Connectivity scores are expressed as a percentage relative to the most connected locations in England and Wales. For example, a score of 50% indicates that a location has half the level of connectivity of the most connected areas. Importantly, this does not represent "average connectivity". The Department for Transport clarifies that average connectivity corresponds to a higher score. Further clarification is provided by DfT below:

	Overall
10th percentile	38.9
20th percentile	52.1
30th percentile	58.6
40th percentile	63.1
Median	66.8
60th percentile	70.2
70th percentile	73.7
80th percentile	77.8
90th percentile	83.2

3.7 Figure 3.1 illustrates the sustainable transport connectivity score for the Site, considering all sustainable modes except driving. The Connectivity Tool displays results using a colour scale ranging from red (most connected) to violet (least connected).



Figure 3.1: DfT Connectivity Tool – All Sustainable Transport Modes'

3.8 The figure indicates that the Site has a connectivity score of 31, placing it within the lowest 10th percentile of the sustainable transport connectivity scale.

3.9 This demonstrates that the Site is poorly connected by sustainable transport modes to a basket of everyday facilities. It is therefore reasonable to conclude that the private car is likely to be the dominant mode of transport for most journey purposes.

3.10 This conclusion is reflected in Census data for Barns Green, presented in the Applicant's Transport Statement and reproduced below.

Usual method of travel to work	2021
Bus, minibus or coach	1%
Train	8%
Driving a car or van	81%
Passenger in a car or van	4%
Bicycle	1%
On foot	5%

Table 3.1: Census data of usual method of travelling to work

3.11 The data indicates a high reliance on the private car for journeys to work with approximately 81% of residents driving a car or van to work, with a combined total of approximately 85% travelling by car when

passengers are also included. This demonstrates that the private car remains the dominant mode of travel for commuting among residents.

3.12 After the private car, the next most common method of travel is train, accounting for 8% of journeys. To be clear, there is no railway station within Barns Green. Residents who identify that the train is their main mode of travel on a journey have to travel to Christ's Hospital railway station. In practice, most residents are likely to access the station by car because:

- the distance from Barns Green makes walking impractical; and
- bus connectivity to the station is poor.

3.13 Consequently, it is likely that approximately 93% of journeys involve car use, comprising 89% as driver and 4% as passenger.

3.14 Despite this, the Proposed Development does not propose any substantive improvements to the existing sustainable transport offer that would fundamentally alter established travel patterns. In the absence of meaningful improvements to sustainable transport infrastructure or services, the Proposed Development would be highly car-dependent, reinforcing existing travel patterns rather than supporting a meaningful shift towards sustainable modes.

4.0 HIGHWAY ACCESS

Proposed Highway Access

4.1 The Site has a narrow frontage to the public highway, which is formed by Chapel Road. As a consequence, the proposed site access is located directly opposite the vehicular access to the Queens Head public house car park and its associated loading area.

4.2 The application documents do not provide any meaningful assessment of the safety and practical implications of this arrangement for the public house. In particular, there is no assessment of how delivery vehicles will access, manoeuvre within and exit the pub's frontage and loading area once the proposed development access is operational.

4.3 This is a significant omission given that the proposed access would introduce additional vehicle turning movements directly opposite an existing car park access and loading area, creating the potential for conflicting vehicle movements on Chapel Road.

Planning Application DC/25/2057

4.4 The transport assessment fails to meaningfully consider the development immediately to the south of the Site, which is the subject of planning application DC/25/2057 for 68 dwellings.

4.5 The proposed highway access for DC/25/2057 is located approximately 40 metres south of the proposed access to the Site. Furthermore, DC/25/2057 proposes traffic management measures which commence at, or in the immediate vicinity of, the proposed access to the Site.

4.6 The DC/25/2057 proposals have the potential to materially affect the operation, character and capacity of this section of Chapel Road and are therefore directly relevant to the assessment of the proposed access. However, they do not appear to have been properly taken into account in the Applicant's transport assessment.

4.7 The close proximity of the two proposed development accesses is particularly important. The Applicant's assessment should demonstrate how the two access arrangements would operate together, including the interaction of vehicle turning movements, visibility, pedestrian movements and the proposed traffic management measures.

4.8 Without such an assessment, it is not possible to establish whether the proposed access would operate safely and effectively within the highway environment that would reasonably be expected to exist should DC/25/2057 come forward.

Permitted Development – Herons Reach

4.9 The assessment must also take account of Planning Application ref. DC/19/2052 ("Herons Reach Permitted Development"), which benefits from planning permission and includes:

- demolition of the existing village shop;
- restoration and refurbishment of the listed Herons Reach building;
- erection of a replacement standalone shop building with residential accommodation above;
- erection of a new residential dwelling; and
- formation of a new vehicular access onto Chapel Road.

4.10 The permitted development will materially alter the existing movement pattern along Chapel Road, particularly in the vicinity of the Site's proposed access. The relocation of the village shop, together with the creation of a new vehicular access, will change the pattern of vehicle and pedestrian movements and the way in which this section of the highway is used.

4.11 These changes are not hypothetical: they arise from an extant planning permission and therefore form part of the reasonably foreseeable highway context against which the proposed development should be assessed.

Highway Access Conclusion

4.12 The combined effect of the permitted Herons Reach development and the proposed development immediately to the south under DC/25/2057 is therefore highly relevant to the operation and safety of the proposed Site access. Taken together, these developments would introduce additional vehicle accesses, turning movements, pedestrian activity and associated traffic management measures within a short 80-metre section of Chapel Road.

4.13 This is particularly significant given that the section includes the village shop, which is likely to be one of the busiest points in the village in terms of pedestrian activity. The cumulative impact of these changes therefore needs to be considered holistically, rather than assessing the proposed Site access in isolation.

4.14 The Applicant's transport assessment does not provide a comprehensive assessment of how these planned highway alterations would operate together. Absent such an assessment, the Applicant has failed to demonstrate how the Proposed Development would contribute to safer and more attractive sustainable travel or that there would not be an unacceptable impact on highway safety.

4.15 Having regard to the concerns identified above regarding the location of the Proposed Development, a more holistic approach to highway design within this part of the village would be appropriate. Consideration should be given to the cumulative impact of development along the stretch from the junction with Hordens Road, continuing northwards to a point beyond the junction with Muntham Drive.

4.16 A coordinated traffic management scheme should be developed for this wider area, with a clear focus on the safe movement of all road users, particularly pedestrians, cyclists and other vulnerable users. The cumulative effect of opening up multiple new accesses along this stretch could increase conflict and create additional safety risks.

4.17 Where possible, opportunities should therefore be explored to share or consolidate access points, rather than creating multiple individual accesses. This would reduce the number of new junctions onto the highway and allow for a more coherent and safer approach to traffic movement along this part of the village.

5.0 TRANSPORT STATEMENT

Multimodal Trip Generation

5.1 The Applicant's transport assessment does not provide a multimodal trip generation forecast and assessment. Instead the assessment appears to focus principally on vehicular traffic generated by the Proposed Development.

5.2 TR6(3) expressly requires assessment of movement patterns and potential impacts having regard to multimodal trip generation and the promotion of sustainable modes of travel. The assessment should therefore establish the likely number and distribution of trips by car, walking, wheeling, cycling and public transport and consider the implications of those movements for the surrounding network.

5.3 This is critical given the Site's poor sustainable transport connectivity and the evidence of high existing car dependency within Barns Green. The absence of a proper multimodal assessment means that the Applicant has not demonstrated how the development would contribute to, or interact with, sustainable patterns of movement.

5.4 Nor has the Applicant demonstrated that a cumulative development scenario would support a meaningful shift towards sustainable modes. The omission is therefore directly relevant to both TR3 and TR6.

Construction Impacts

5.5 There is no assessment of construction-phase impacts nor how construction traffic would be managed, including:

- the anticipated number and type of construction vehicle movements;
- the likely routes to and from the Site;
- the timing of construction traffic movements;
- the management of HGV and delivery movements;
- measures to protect pedestrians and cyclists;
- the effects of construction traffic on existing highway capacity and safety;
- arrangements for construction access and site compound activity; and
- appropriate mitigation and monitoring measures.

5.6 This omission is directly contrary to NPPF Policy TR6(4), which makes clear that the requirement to demonstrate that there would not be severe adverse impacts on the transport network or unacceptable impacts on highway safety during both during the construction phase and following completion.

5.7 The absence of a construction impact assessment therefore means that the Applicant has failed to demonstrate that the development would comply with TR6(4). In accordance with NPPF Policy TR6(4), planning permission should therefore be refused.

6.0 SUMMARY AND CONCLUSION

6.1 The assessment of the Proposed Development has identified a number of significant deficiencies in the Applicant's consideration of transport and highway matters. These deficiencies are particularly important given the Site's relatively poor sustainable transport connectivity, the high level of existing car dependency within Barns Green, and the changing highway environment arising from other permitted and reasonably foreseeable development in the immediate vicinity.

6.2 The DfT Connectivity Tool identifies the Site as having a sustainable transport connectivity score of 31, placing it within the lowest 10th percentile of the connectivity scale. This, together with the available Census evidence showing a very high reliance on the private car, demonstrates that the Site is not presently well connected by sustainable modes. The Proposed Development does not propose substantive improvements to the sustainable transport network capable of fundamentally addressing these existing constraints. The development would therefore remain highly car-dependent and does not demonstrate how it would support a meaningful shift towards sustainable patterns of movement, as sought by NPPF Policy TR3.

6.3 There are also significant concerns regarding the proposed highway access and the failure to meaningfully assess it within its wider and reasonably foreseeable highway context. The proposed access would be located directly opposite the existing access and loading area serving the Queens Head public house, creating the potential for conflicting vehicle movements. In addition, the proposed access is only approximately 40 metres from the access proposed under DC/25/2057, while the

permitted Herons Reach development includes a further new vehicular access and the relocation of the village shop. These changes would materially alter vehicle and pedestrian movements along this part of Chapel Road.

6.4 The combined effect of these developments is particularly significant because the relevant highway changes are concentrated within a short section of approximately 80 metres, which also includes the village shop and is likely to represent one of the busiest locations within the village in terms of pedestrian activity. The potential interaction between multiple accesses, turning movements, pedestrian movements and traffic management measures cannot therefore properly be assessed by considering the Proposed Development in isolation.

6.5 A more holistic approach to highway design and traffic management is required, extending from the junction with Hordens Road northwards beyond Muntham Drive. In particular, consideration should be given to whether access points can be shared or consolidated and whether a coordinated traffic management scheme can be developed which prioritises the safe movement of pedestrians, cyclists and other vulnerable road users. The cumulative introduction of multiple new accesses has the potential to increase conflict and highway safety risks and should be addressed as part of a comprehensive assessment.

6.6 The Applicant's Transport Statement is also deficient in its assessment of movement and transport impacts. It does not provide a multimodal trip generation assessment addressing the likely distribution of trips by car, walking, wheeling, cycling and public transport. This is a material omission in the context of NPPF Policy TR6(3), which expressly requires movement patterns and potential impacts to be considered having regard to multimodal trip generation, sustainable modes of travel and reasonable future scenarios, including cumulative impacts.

6.7 Furthermore, there is no assessment of construction-phase impacts or adequate explanation of how construction traffic would be managed. In particular, the application does not establish the anticipated construction vehicle movements, routing and timing, management of HGVs and deliveries, construction access arrangements, impacts on pedestrians and cyclists, or the effects of construction traffic on highway capacity and safety. Nor are appropriate mitigation and monitoring measures identified.

6.8 This is a significant omission given that NPPF Policy TR6(4) expressly requires consideration of transport and highway safety impacts both during the construction phase and following completion. The absence of a construction-phase assessment means that the Applicant has not demonstrated that the development would avoid severe adverse impacts on the transport network or unacceptable impacts on highway safety.

6.9 Overall, the application has not demonstrated that the Proposed Development would provide safe and suitable access for all users or that its transport impacts can be satisfactorily accommodated within the existing and reasonably foreseeable highway environment. In particular, the assessment fails to address the cumulative implications of the permitted Herons Reach development and previously proposed application DC/25/2057, the Site's poor sustainable transport connectivity, multimodal movement patterns and construction-phase impacts.

6.10 For these reasons, the Proposed Development has not been demonstrated to comply with NPPF Policies TR3 and TR6. The deficiencies identified are fundamental to understanding the transport and highway implications of the proposal and cannot be addressed by considering the Site access or traffic generation in isolation. In accordance with NPPF Policy TR6(4), the application should therefore be refused.