



Active
Travel
England

Active Travel England
West Offices
Station Rise
York
YO1 6GA
Tel: 0300 330 3000

Your Ref: DC/26/0366
Our Ref: ATE/26/00424/OUT
Date: 26/03/2026

Active Travel England Planning Response Detailed Response to an Application for Planning Permission

From: Spatial Planning Service, Active Travel England

To: Matthew Porter - Horsham District Council

Application Ref: DC/26/0366
Site Address: Land Northwest of Southwater

Description of development: 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.

Notice is hereby given that Active Travel England's formal recommendation is as follows:

Deferral: ATE is not currently in a position to support this application and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

1.0 Background and Summary

- 1.1 Active Travel England (ATE) welcomes the opportunity to provide formal recommendations on the above planning application, which seeks outline approval for the delivery of a new mixed-use community of approximately 2,500 people to the west of Southwater in West Sussex.
- 1.2 Prior to submission, ATE issued detailed pre application advice dated 05 February 2026. This sought a vision led approach to the Transport Assessment (TA), Travel Plan (TP) and wider connectivity, moving away from traditional peak hour, vehicle focused assessment. In line with ATE's expectations for major development, this requires multi-modal trip generation, distribution and assignment, alongside a place-based approach to internal masterplanning and off-site infrastructure that clearly prioritises walking and cycling in line with national planning policy.
- 1.3 Accordingly, ATE has assessed the application against the **National Planning Policy Framework (NPPF)**, with specific regard to delivering healthy and inclusive places while achieving a vision-led outcome the promotes sustainable transport and includes the surrounding area (**parags 96, 109, 110, 115, 117, 118 and 135**).
- 1.4 ATE's pre application advice also referenced **LTN 1/20, Manual for Streets, Inclusive Mobility**, the **National Design Guide, Building for a Healthy Life**, the **ATE Planning Assessment Toolkit**, and the ambitions of the **Second Cycling and Walking Investment Strategy (CWIS2)**. More locally, the application was expected to reflect the infrastructure priorities of the **Horsham Local Cycling and Walking Infrastructure Plan**.
- 1.5 From reviewing the application, a number of matters require further consideration and discussion with ATE to secure a sustainable movement strategy that prioritises walking and cycling on and off site. These are summarised as follows:
 - a) The application and more specifically its Transport Assessment (TA) does not quantify the daily multi-modal trip generation of the mixed-use development, nor distribute or assign these trips to the local network to inform internal and off-site infrastructure design.
 - b) The Travel Plan (TP) contains no modal share targets, which is contrary to a vision-led approach where outcomes are required to be defined at the outset and infrastructure designed to deliver and meet these targets.
 - c) While the applicant is willing to engage with WSCC and HDC on off-site infrastructure and contributions, this discussion would be far better informed once the issues identified at 1.5 a) and b) above are addressed. Significant concerns are raised by ATE regarding the submitted designs for off-site infrastructure, the level of detail presented, and the issues of personal safety and security, particularly in relation to use of routes by women and girls.
 - d) ATE raises concerns regarding aspects of the internal masterplanning, of the site associated with layout, surfacing and specification. Although this is an outline application, these matters require conditioning and resolution prior to reserved matters to ensure the quality and provide clarity and consistency of expectations for future detailed applications.

2.0 Trip Generation, Assignment & Mode Shares

- 2.1 The development is proposed in an evidently car reliant location, as demonstrated by **2011 Census Travel to Work** data in **TA Table 3 4**, where walking and cycling together account for less than 6% of trips and car use represents almost 80%. Despite this, TA paragraph 3.6.3 suggests that “*a significant proportion (of people) travel by alternative modes*”. This assertion is not supported by the data presented and is more indicative of long travel distances to employment and a poor environment for walking and cycling.
- 2.2 ATE is disappointed that the TA and TP largely fail to respond to the scoping requirements set out in ATE’s pre application advice of 05 February 2026. The TA does not quantify daily trips by active modes nor assign them to the local network, while no TP targets are set against which a credible and successful multi-modal strategy can be developed and measured against. This approach is inconsistent with a vision led methodology and current policy (**NPPF parags 109, 115 and 118**).
- 2.3 More specifically:
- a) **Daily Multi-modal trip generation** for each use has not been forecast. While the TA references a “*Vision led Trip Generation*”, it does not quantify walking or cycling movements, despite these amounting to thousands of daily trips. This request was clearly set out in *ATE pre application response paragraph 2.1, bullet 5*. The current forecasts are inherently peak hour and focussed only on vehicle movements, which overlooks that commuting accounts for fewer than 15% of all journeys (**National Travel Survey, DfT**).
 - b) **Distribution and assignment** for all modes is absent. Only vehicular trips are distributed and assigned, contrary to *ATE pre application response paragraph 2.1, bullet 8*. This effectively de-prioritises the need to quantify and agree the correct specification of active travel provision.
 - c) **Absence of Mode Share Targets:** The TP contains no mode share targets. While **TP 1.2.4** refers to the need for SMART objectives, no targets are identified, even indicatively. Instead, baseline surveys and target setting are deferred until occupation of the 500th dwelling (**TP Table 9.1**), at which time travel behaviours and car reliance are already well established and incredibly hard to reverse. This is the opposite of a vision-led approach.
 - d) **TP remedial actions** are not defined should targets not be met. The TP postpones deciding what actions *might* be taken until a later date, without specifying what these measures could be, or allocating funding beyond TP administrative and management costs (**TP 5.4.3**). The option to “*revise targets accordingly*” could potentially allow for less ambitious outcomes, reinforcing ATE’s concern that this ‘wait and see’ approach to travel planning is a purely retrospective and most likely ineffectual approach.
- 2.4 Taken individually and cumulatively, the TA does not provide an effective basis for delivering a healthy, sustainable community. It remains focused on prioritising the assessment of peak hour highway capacity, while failing to quantify active travel demand. Similarly, the TP relies on retrospective intervention, an approach widely associated with the failure of residential travel plans.

3.0 Off Site Infrastructure

- 3.1 **TA Annex G** illustrates the applicant's transport strategy and identifies several interventions. However, this would be far more meaningful if supported by quantified daily pedestrian and cycle movements in addition to peak hour flows to allow route prioritisation and appropriate specification as requested earlier.
- 3.2 While the TA references ATE's Planning Assessment Toolkit (**TA 4.4**), it is notable that only the **Walking Route Audit Tool (WRAT)** has been applied. No **Cycling Level of Service (CLOs)** assessments have been undertaken, despite being recommended within the same toolkit. As a result, cyclist needs are insufficiently considered.
- 3.3 ATE makes the following observations in respect of the off-site infrastructure strategy:

3.4 Christs Hospital Road (CHR) & Two Mile Ash Road (TMAR)

- 3.4.1 These routes connect the site to the nearby school and railway station and are therefore strategically important. CHR is described as "low speed" (**TA 4.4.12**), although supporting speed data to verify this could not be located.
- 3.4.2 The need for interventions along CHR and TMAR is supported in principle, but the proposals (**WSP dwgs 0106-01 P01** and **0105-01 P02**) are insufficient in extent and ambition and fail to consider the entirety of the route. ATE is happy to suggest additional features that could better prioritise pedestrians and cyclists.
- 3.4.3 Lighting to this route is essential given the need for year-round use, especially with regard to personal safety and the security of women and girls. This is an area of work where the transport consultancy appointed by the applicant has recently made significant and valuable contributions: <https://www.wsp.com/en-gb/insights/advancing-safe-community-spaces-for-all>
- 3.4.4 The absence of a direct pedestrian and cycle connection from the site's north west corner to CHR is particularly concerning, given this area is described as the **Northern Gateway** in the **Design and Access Statement (DAS)**. A direct link opposite the CHR/TMAR junction would be significantly more direct, attractive and well used. This is considered further below in **paragraph 4.4**.

3.5 Worthing Road between New Road and Chessall Avenue

- 3.5.1 Worthing Road forms a critical eastern boundary and connection to and from the proposed schools, local services and employment areas. The existing environment is poor for pedestrians and entirely unsuitable in encouraging safe cycling for all members of the community.
- 3.5.2 Proposed interventions (**WSP dwg 0107 P01**) lack sufficient detail and do not constitute a coherent, inclusive scheme. Cycle facilities are unclear, junctions are inadequately addressed, crossings are for the most part informal at best, while bus stop provision (as shown) remains substandard. Speed cushions north of the roundabout are unsuitable for cycling, while footway widening proposals provide

little or no meaningful benefit. In short, the proposals put forward do not constitute or contribute towards the delivery of a high-quality active travel network, but a series of isolated and largely superficial (painted) interventions that are unlikely to change the nature or attractiveness of this section of Worthing Road.

3.6 Worthing Road south of Cedar Drive / Downs Link

- 3.6.1 This section is excluded from the proposals, despite forming the primary route to Lintot Square and employment areas. Reliance on the Downs Link for utility trips to the south is unrealistic due to its alignment, lack of directness from much of the site, surveillance and lighting constraints and concerns. If lighting cannot be provided, the route may be unsuitable to serve everyday trips outside daylight hours.
- 3.6.2 Considering the phasing of the site, greater consideration is required of the entirety of Worthing Road, and in particularly the more likely access to it via the extended Chessall Avenue, and the identified *Village Way*, which – as a key internal walking / cycling route is much more likely to accommodate active travel movements to the south of the site and which will exit the development to the roundabout with Worthing Road / Cedar Way for which no improvements are considered.

3.7 Routes into Horsham

- 3.7.1 Each of the Worthing Road, Two Mile Ash Road, and Southwater Street/Lovers Lane options are constrained, isolated, lack existing facilities and not fit for purpose in their current form and this is recognised by the TA. ATE supports further discussion on these routes and welcomes the TA's honest assessment of the challenges involved.

3.8 Hop Oast roundabout / linkage to Horsham Golf Course development

- 3.8.1 ATE supports in principle the proposed connections north towards the Horsham Golf Course development and Park and Ride site. To comply with guidance, buffer widths between active travel routes and carriageways must align with **LTN 1/20 Table 6.1's** desirable requirements relative to speed limits (and go much further than a featureless 0.5m separation), with appropriate landscaping to enhance comfort and attractiveness. As this route will be used by schoolchildren and bus users accessing the Park and Ride on a daily basis, there is little excuse not to deliver a genuinely safe and hospitable alternative, as per this [Eastbourne](#) example.

3.9 Footpath network

- 3.9.1 Connections and enhancements to surrounding Public Rights of Way (PRoWs) are supported, where they include improved surfacing, lighting and overlooking where feasible. However, clarity is required on these connections - none are shown in the access and movement strategy (parameter plan - **DAS p66**) – while contributions are unclear, particularly **PRoW 1662** which provides a shorter route to the school and railway station for residents to the south of the site. Improvements to **PRoW 1655** are also expected given the accessibility to sports and leisure facilities to the south.

4.0 Masterplanning and Permeability

- 4.1 The Illustrative Masterplan and DAS seek to deliver an integral walking and cycling network, which prioritises environmental quality as part of the active travel offer. This principle is supported, as is the provision of a 5km 'trim-trail'. ATE does however raise a number of queries and concerns to ensure that such routes are of appropriate specification and feel safe and inclusive for all users.

Phasing

- 4.2 The proposed phasing plan (**DAS p68**) confirms that the southern elements of the masterplan are delivered in the later phases 2 and 3 of the development. Drawing on the concerns raised earlier, this reinforces the need to approach and address deficiencies along the full length of Worthing Road, including the section to the south of Cedar Drive / Chessall Avenue.

PRoW treatments

- 4.3 PRoWs that are incorporated into the masterplan must be upgraded, re-surfaced, adequately lit and benefit from natural surveillance and overlooking wherever possible. Any need to retain their rural 'feel' in such a way that creates isolated and unwelcoming environments sits at odds with providing a safe and secure environment for all users and fails to respond to the needs of the new community. With reference to **DAS p88** the route and treatment of the internal PRoW to reach the Downs Link is particularly poor, where the need to identify a route through the housing area requires to be added.

Active travel route to CHR and station – opportunity for direct connection missed

- 4.4 Given the requirement to provide an attractive, direct and safe route to the railway station, the opportunity to route an active travel link through the proposed north-west meadow area requires further consideration. Well-designed, buff-coloured surfacing combined with low-level lighting are commonplace in sensitive landscapes and would not be visually intrusive, as acknowledged elsewhere in **DAS p113**.
- 4.5 Such a route would improve natural surveillance of the proposed playground and offer a convenient, family-friendly connection to the station. Retaining narrow, poorly surfaced paths (as shown) risks creating muddy desire lines as users invariably seek the shortest connection in avoidance of the isolated TMAR. This represents an obvious opportunity to deliver a direct and high-quality, legible route while avoiding entirely the need for footway works to the southern section of TMAR. As noted elsewhere, the access and movement strategy (parameter plan) is frustratingly vague in respect of delivering anything other than vehicular access.

Village Way inaccuracies and treatments

- 4.5 Conflicting cross-sectional drawings are provided in **DAS pages 90–95** where 2m cycle provision is shown. While these may be typos, these matters require resolution at outline stage to avoid confusion and later disagreement. Shared 5m paths raise the risk of conflict between pedestrians and cyclists. Once again, if the designer is concerned about providing an over-engineered solution, numerous

examples exist of where this has been carried out sympathetically (ie: inbuilt at-grade setts) instead more harsh-looking white line or trapezoid kerb separation treatments, which can understandably override the intention to create a place ahead of a movement corridor.

Footpath / bridleway surfacing

- 4.6 Internal paths away from carriageways must be accessible, inclusive and durable. Loose or self-binding surfaces are not acceptable for everyday use and are prone to rutting, pooling, silting and other structural failures. Sealed, drained and bound surfaces that are prevented from being grown over (ie: by edging strips) should be insisted upon if the whole community is intended to benefit from the active travel provision around the site, as per the pledges of the DAS.

5.0 On Site Facilities

- 5.1 The outline application stage is not too early to consider the form of cycle parking if the quality of provision is to be secured and standardised across the site, given that this often represents the last chance to consider the needs of the development as a whole. ATE strongly urges that conditional requirements or future design codes ensure that cycle parking is provided to the front of properties and/or close to the street either via a garage or separate secure storage area (where properties do not have garages).
- 5.2 The need for frontage cycle parking provision directly influences house design and therefore cannot be deferred to reserved matters, as it needs to *inform* housing design. The common substandard response is the provision of rear garden sheds. This type of provision is neither convenient nor accessible, resulting in space conflicts between bikes, garden tools, furniture, camping equipment and other storage needs and as such do not support everyday cycling, particularly where more than one cycle is desired. This situation fails to align with the need to make cycling attractive and convenient in line with **NPPF paragraphs 110, 115 and 117**.