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Your Ref: EIA/26/0005
Our Ref: ATE/26/00956/PREX
Date: 16 September 2026

Active Travel England Planning Response Response to Pre-Application Enquiry

From: Spatial Planning Division, Active Travel England

To: Horsham District Council

Pre-Application Ref: EIA/26/0005

Site Address: Land South of Adversane, Adversane Lane, Adversane,
West Sussex

Description of development:

EIA Scoping Opinion for a mixed-use development for a new settlement to accommodate 3,200 dwellings, employment uses, community uses and supporting infrastructure.

1. Background

- 1.1. Active Travel England (ATE) welcomes the opportunity to provide recommendations on the pre-application proposal for a new community of up to 7,700 people¹ comprising up to 3,200 new homes, a residential care home, commercial/employment units, which will be made up of a mix of B1/B2/B8 employment, local shops, a food superstore and non-food retail, a secondary school, two primary schools, community facilities, health facilities, a hotel, a safeguarded site for a new railway station; and a new bridge over the railway line from Stane Street replacing the Adversane Lane level crossing.
- 1.2. As set out in the 'Schedule of Suggested Main Modifications to the Submission Local Plan 2023-2040', *"though adjacent to the existing hamlet of Adversane this will be a standalone new settlement, the first new settlement developed in Horsham District in living memory."* Therefore, this development will present a sizeable new settlement within the existing rural area, and the proposals also include the delivery of local facilities, which will attract movement from the wider area.
- 1.3. Developments coming forward outside of a formally adopted allocation may require a greater degree of site-specific assessment and mitigation to demonstrate how sustainable travel objectives will be achieved, and how active travel infrastructure will be identified, designed and delivered, ensuring that future residents have access to safe, direct, coherent, and attractive alternatives to private car use from the outset.

¹ based on Census 2021 average household size (2.36 persons per dwelling)

- 1.4. The expectations set out by ATE in its published guidance and within these recommendations are for walking, wheeling (trips made by wheelchair and mobility scooters) and cycling to be seen as the most convenient, desirable and affordable way to travel.
- 1.5. As a statutory consultee to the planning process, ATE is keen to work with councils and applicants to help achieve the goals set out in the third [Cycling and Walking Investment Strategy \(CWIS3\)](#) which is to boost overall levels of walking, wheeling and cycling across England, with the aim that 55% of all short stages in towns and cities should be walked or cycled by 2035, and 60% of children aged 5 to 16 should usually walk, wheel, or cycle to school by 2035. This will assist in delivering healthy and active communities, and supporting each of the government's missions for housing, health and integrating transport.
- 1.6. Further to the above, ATE requires all consultants preparing Transport Assessments (TA) to undertake a vision-led approach to assessing developments, pursuant to **chapter 15** of the [National Planning Policy Framework \(NPPF\)](#) published in August 2026, which prioritises sustainable modes of travel, while delivering safe and healthy places which support active lifestyles and social interaction in accordance with **NPPF policies DP3, CC2, TR3, TR4, P5.1a and TR8**.

2. Assessment Requirements

- 2.1. In accordance with the above policies, ATE recommends the following methodology to assess and quantify the accessibility needs of all members of the community and provide a comprehensive assessment of the local area in the context of promoting healthy communities and prioritising sustainable transport in line with NPPF **policies DP3, TR3, TR4 and TR8**
 - Assess proposals against [ATE's Planning Assessment Toolkit](#) and provide this assessment in full and as part of the TA. Some of the criteria within the toolkit will be informed by the assessments below.
 - Produce a geographical plot of local education, retail, leisure, employment and other destinations upon which future residents / employees will rely, identifying distances using an isochrone (and not concentric crow-fly distances) between the centre of the proposed development and the destinations identified.
 - Forecast the daily person trips (arrivals and departures) generated by all uses within the development, derived from person trips or other evidence base that could usefully inform the proposals. This should be done by different phases of the proposed development. Establish the number of trips by purpose*.
 - Forecast mode shares for each trip purpose², according to the distance to and availability of key destinations and the quality / quantity of relevant connections.
 - Forecast mode share targets are required to reflect a vision-led approach that is influenced by and derived from: a) the applicant's ambition to prioritise active travel for all trips, and b): the quality of existing and proposed infrastructure in line with **NPPF policies DP3.2d and 2f; TR3.1; TR4.1a, b and c and TR8**, demonstrating how the application will meet (or make

² The reliance upon historic census journey-to-work data from 2011 to inform mode shares for all movements will not be supported. It is recommended that the National Travel Survey is interrogated for this purpose.

significant progress towards meeting) the objectives of CWIS3 for 55% of all trip stages in towns and cities to be made by active modes by 2035.

- Submit a mapped distribution and assignment of two-way (arrivals and departure) movements for all walking, cycling and public transport journeys generated by the development once fully occupied, alongside both a daily and peak hour analysis to inform active travel infrastructure requirements.
- Identify specific routes that existing and future communities will rely on to access the development within a 0.8km (walking and wheeling) and 5km (cycling) distance to inform step 4, below. This is particularly relevant given the likely phasing of the facilities of the proposed development, and reliance on external facilities in the initial phases.
- Undertake a qualitative and critical analysis of the local active travel routes identified above upon which the new community will rely from the perspective of walkers, wheelers, cyclists and public transport users of all abilities, ages and genders considering directness, width, surface quality, safety, attractiveness, lighting and natural surveillance and how these matters will affect feelings of personal security at all times. Where cycles are required to use a road, assess the route against **Local Transport Note (LTN) 1/20 Figure 4.1**.

3. Off-site infrastructure

- 3.1. The assessment of surrounding infrastructure set out above will usefully inform further discussions regarding potential improvements to the local environment to support active and healthy lifestyles in line with **NPPF policies TR3 and TR4**.
- 3.2. The Technical Note “Marringdean Road Options Pre-app discussions” outlines the applicant’s preferred option of Marringdean Road for providing active travel connectivity from Kingswood to Billingshurst. ATE appreciates that a significant amount of work has been undertaken to reach this conclusion, however, further consideration should be given to the A29 route, given it would provide a more direct route from the site to Billingshurst, with the benefit of passive surveillance from vehicle traffic. Similarly, contributions to the upgrade of PRowS between the site and Billingshurst should be considered to provide a direct pedestrian route. Both these opportunities should be fully investigated and agreed with relevant landowners to avoid missed opportunities to deliver valuable connections. Further discussion should be undertaken with ATE to consider potential constraints outlined by the applicant at paragraph 1.3.1.
- 3.3. Regarding Marringdean Road itself, the applicant has proposed reducing the speed limit to 20mph. Given the forecast traffic flows of 4,200 – 4,300 vpd with the full Kingswood buildout, the applicant has correctly judged that the road would score “*suitable for most to not suitable for all*”, as per **LTN/20 Figure 4.1**. Given this route could serve as the primary route for active travel for the proposed development, prioritising walking, wheeling and cycling movements on this route is key to facilitating a genuine choice of modes. Therefore, features should be considered to remove through traffic, ensure that the route is adequately lit and benefits from good sightlines given the lack of natural surveillance, thereby creating a route that is safe, inclusive and attractive for all users. The applicant has considered ATE’s **Rural Design Guide**; however, consideration should be given to the Exeter Green Lanes case study, which has implemented a growing network of low-traffic rural lanes. ATE considers an on-site connection to Marringdean Road would also facilitate a safe, attractive environment.

- 3.4. Any proposed enhancements to the local cycling network would be expected to conform with the design requirements set out in [Local Transport Note 1/20 \(LTN1/20\)](#) while enhancements to the walking and wheeling network would be expected to conform with the design requirements of [Inclusive Mobility, Manual for Streets](#), the [National Design Guide](#) and [Building for a Healthy Life](#) in respect of providing safe, direct, convenient and accessible routes for people of all abilities.

4. Masterplanning

- 4.1. ATE will review the package of submitted drawings, including any illustrative masterplans and parameters plans and seek that all opportunities for a porous and connected form of development are exploited in the interests of integrating the community with its surroundings through a permeable and legible active travel network in alignment with **NPPF policy TR4**.

- 4.2. All major new development should foster active, healthy lifestyles and social interaction, building in wider connectivity from the outset to establish sustainable travel habits and patterns in accordance with **NPPF policies DP3.2d, f and HC1.1e**. Initial observations are as follows:

- **Severance** - there is potential for separation between neighbourhoods within the site due to the railway line, potentially deterring active travel, and increasing reliance on the railway bridge. Consideration should be given to mitigating this severance, including exploring the usage of the track which runs adjacent to Hepworth Brewery for active travel use only.
- **Personal Security** - routes within the local area must benefit from generous natural and passive surveillance, avoiding sharp turns, unlit areas or routes through dense vegetation, which may be a concern with regard to Marringdean Road.
- **Local Centre** - the centrally placed neighbourhood and secondary neighbourhood centres and their local facilities appear to make sense in terms of future accessibility, although it is anticipated it may be some time before these facilities are delivered. Where possible, and given the isolated nature of the development, phasing of local facilities should be brought forward to enable sustainable trips within the development.
- **Permeability** - the masterplan should aim to achieve a porous network of direct and inclusive walking and cycling routes that criss-cross the masterplan and avoid convoluted or circuitous journeys. Accesses and linkages for active travel users should outnumber those for vehicles, while public transport priority should be incorporated wherever possible to provide journey time advantage over general traffic.
- **Leisure routes** the emphasis on regular and numerous leisure routes is supported. However, these must be designed to be inclusive and usable by all, and at all times of year. The use of loose-bound gravel will not be supported as this creates a barrier to access by buggies, wheelchairs and mobility scooters preventing the enjoyment of these facilities by all sections of the community, particularly during winter months where water, frost and silting result in pooling, silting, cracking and other surface degradation which renders routes inaccessible and unattractive. ATE would expect that the use of a grey or buff-coloured bound tarmac surface is embedded in planning conditions / future design codes.

- A **Design and Access Statement** (DAS) setting out an indicative route and street hierarchy for active travel as well as vehicular movements will be expected as part of the forthcoming submission to inform the agreement of parameters plans.
- **Design parameters** - Further assessment of the masterplan will assist in determining street typologies and specification, for instance whether active travel routes will require a segregated route for pedestrians and cyclists, or whether street design can enable cycling along the carriageway. Where possible, street design should seek to incorporate features to avoid the need for retrospective measures (i.e. speed cushions) to address sections of carriageway where likely speeds may exceed 20mph.
- **Cycle Parking provision** - An important consideration to be raised at this stage is the location of cycle parking. While this may initially not be considered relevant to an outline application, this has implications for plot design, size, garaging and garden space. The assumption that a single garden shed is sufficient for bicycle storage remains unacceptable given the likely competition for space with other needs (i.e. garden chairs, barbecues, garden tools, mowers, camping equipment etc). Specific and separate bicycle storage facilities that are located to the front of houses and therefore providing convenient access to the highway (in the absence of a suitably sized garage) are required in order to effectively promote and prioritise this mode of travel in line with policy.

5. Next steps

- 5.1. ATE is content to be involved in further dialogue as proposals develop further towards submission. It should however be noted that the recommendations given by ATE in this response are based on information supplied at the time of the pre-application consultation and are reflective of the quality and detail contained within the submission. Subsequently, these recommendations should not be considered to constitute an exhaustive and comprehensive response to a later planning application.
- 5.2. As such, these comments are made without prejudice to any other matters which may arise from further submissions, correspondence or assessment work containing more detailed information and subject to internal consultation with appropriate sections of ATE; particularly where, in ATE's opinion, appropriate safety and accessibility standards cannot be achieved. These recommendations therefore cannot be considered as confirmation that any subsequent planning application will be acceptable to ATE.