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Your Ref: DC/26/0366
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Date: 10/07/2026

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 North West 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 up to 1,000 residential dwellings (including affordable housing) (Use Class C3); up to 80 specialist accommodation units (Use Class C2); 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 Horsham District Council (HDC) has consulted ATE for a further time on the above application for a mixed-use new community to the north and west of Southwater, comprising up to 1,000 homes, a local centre, employment and secondary/primary school education, following the submission of a revised masterplan and Design and Access Statement, a **Response to ATE technical note (TN02)** and accompanying access and off-site highway drawings.
- 1.2 ATE concurs with HDC's emerging local plan in that transport is a key issue for the local area, and that this development provides the opportunity to deliver sustainable transport options in terms of promoting cycling and walking, opening and improving links to adjacent settlements. In summary, ATE can see the application is moving in a positive direction, although requests further amendments / improvements.

- 1.3 The HDC submission Local Plan was clear and correct in that this development would be supported subject to the funding and/or delivery of the following works:

a) Deliver a connected walking and cycling network with direct, attractive routes that prioritise active travel and link to existing and strategic routes, including connections between Horsham and Southwater.

b) Improve sustainable access to Christ's Hospital station through:

- *a new connection via Two Mile Ash Road and Christ's Hospital Road;*
- *additional station parking and cycle storage;*

c) Deliver transport infrastructure including:

- *a new link road to Hop Oast roundabout;*
- *signalisation and upgrading of Hop Oast roundabout;*
- *four development access points;*
- *internal walking and cycling routes;*
- *Cedar Drive roundabout improvements;*
- *a new pedestrian and cycle crossing between Southwater and Horsham.*

- 1.4 ATE is encouraged that the applicant has sought to proactively address and investigate each of the above and has met with ATE and West Sussex County Council (WSCC) following ATE's initial response of 26 March 2026. However, and while progress has been made on a number of issues, the following matters require further discussion before a positive recommendation can be made.

- **Trip generation, mode shares and Travel Planning:** ATE is grateful for the revised analysis but remains concerned that mode shares are reflective of the poor quality of existing off-site infrastructure. The aspiration for all internal trips to be made by active travel is supported, as is the overall 36% active travel mode share. Achieving this is however entirely dependent on route quality.
- The **Revised Travel Plan** could not be obtained from the HDC website (appendices were not included within **WSP TN01**). ATE expects the forecasted vision-led mode shares to match the Travel Plan targets with a clear mechanism explaining how those targets will be proactively achieved alongside funding / interventions if targets are not met. Waiting until residents move in before setting targets is considered reactive and poor practice and evidentially results in the failure of Travel Plans. In the absence of measurable targets and enforcement mechanisms, the validity of the TA's forecasts is questionable.
- The **off-site works package** needs to better reflect a vision-led development of 2,500 new residents rather than a continuation of poor infrastructure. Financial contributions to Worthing Road alongside physical interventions to the route to Christ's Hospital railway station are essential in meeting policy requirements. Elsewhere, suggested amendments to the north (A24 / Hop Oast roundabout) are considered reasonable, while ATE suggests amendments elsewhere.
- The **masterplanning** and **DAS** still provide insufficient comfort as to the specification of active travel routes within the site and remain concerningly silent on the need for segregation between pedestrians and cyclists. The applicant cannot promote the internal infrastructure as an alternative route to Worthing Road for active travel in the absence of this commitment. ATE would welcome a stronger commitment to the quality of internal footpaths and cycle parking provision rather than to have to raise the same issues again at reserved matters.

2.0 Trip Generation, Assignment & Mode shares

2.1 Multi-modal Trip Generation

- 2.1.1 Journey purpose by mode is now presented **TN02 Table 1**. As expected, this reveals fewer than half of all journeys (during the morning peak period) relating to commuting trips, with just over a third in the evening peak and around 8% during the daytime. This supports the concerns raised by ATE previously around the unreliability of journey to work census data being used as a proxy for mode shares for all trips and at all times of day.
- 2.1.2 When expressed as a daily total, **TN02** reveals a total of just under 7,000 person trips (arrivals and departures) being generated by the 1,000 homes proposed, including 1,674 internal trips and 5,322 trips to/from external destinations between 07:00 and 19:00 hours, by all modes of travel and for all purposes, with commuting accounting for just under 2,000 of these trips (28%).
- 2.1.3 In respect of the employment uses, these are forecast to generate a further 1,771 external two-way trips by all modes between 07:00-19:00 once a reasonable 10% reduction has been made for internal trips to avoid double counting.
- 2.1.4 Regarding the Secondary School proposed on site, this is forecast to generate 2,281 further trips each day (excluding internal trips) again adjusted to remove internal trips for the same reasons as above. Both the employment and educational uses are therefore confirmed as generating substantial levels of off-site movement
- 2.1.5 Bringing the above together results in a forecast of 9,452 movements that originate from and cease at external destinations each weekday once internal trips are discounted. Of these movements, only 4.4% are forecasted to be made by bicycle with 18.5% predicted to be by foot, mobility scooter or wheelchair. A further 12.1% are forecasted to be bus trips, while 2.3% are identified to be rail trips. The majority of off-site trips to / from the site remain as car passengers and drivers, which account for 5,907 of daily trips, or 62%.
- 2.1.6 The assumption that all of the 1,674 internal trips will be made by active modes is a reasonable aspiration and would realise a combined (internal / external) active travel mode share of 34.6%, although this is entirely reliant on strong design-coding / masterplanning where on-site infrastructure meets the requirements of **LTN1/20** to properly segregate cyclists and pedestrians in addition to sound masterplanning that avoids secluded, unsurveilled and/or poorly lit and poorly surfaced and indirect routes that are unattractive. These matters are covered later in **section 4.0**.
- 2.1.7 If the applicant believes these mode shares to be achievable and the vision-led scenario will be delivered, then these mode shares require to be embedded within the Travel Plan as targets upon which sufficient focus is applied in order to realise these aims. In the absence of this, the credibility of the **TA** and **TN02** are called into question – see **section 2.3** below.

2.2 Distribution and Assignment

- 2.2.1 The forecast off-site additional movements are distributed and assigned to the local highway network, the methodology for which is described in **TN02 Section 2.2**. This is accompanied by illustrative diagrams at **TN02 Appendix C**.
- 2.2.2 Of particular interest, in respect of the quality of routes to and from the site are the demands identified to and from Lintot Square; along Cedar Drive; to, from and across the Hop Oast roundabout, and more generally along Worthing Road. This informs later recommendations provided in **section 3.0** of this response.
- 2.2.3 The comparably low levels of cycling that are evidenced in **Travel Plan Table 3-4** where cycling accounts for 1% of commuting trips entirely reflects the poor standard and/or lack of safe cycling infrastructure in this area. The TN argues the proposed mode share of 4.4% to be *vision-led*, but even this modest increase is highly unlikely to be realised in the absence of a comprehensive off-site package of infrastructure improvements that focuses on multiple locations, given the orientation / linear nature of the site, which relies on a number of entry points and sections of Worthing Road.

2.3 Travel Plan

- 2.3.1 Taking into account the vision-led forecasts in **TN02**, the development proposes a total active travel mode share of 36.4% for internal and external trips. ATE expects to see this target embedded within the travel plan against which the success of the vision-led approach (and its TA) will be evaluated and towards which minds can be focussed and arrangements put in place to meet this goal. It is understood that an updated Travel Plan has been produced, (**TN01 Appendix K**), but unfortunately only the text component of the document appears to have been uploaded.
- 2.3.2 In the absence of targets, there is very little point in the Travel Plan existing at all, as the actions within it become largely retrospective and ineffectual, as has been shown to be the case of numerous housing developments around the country. Delaying target-setting until people have moved into a development and potentially already adopted unsustainable travel habits and levels of car reliance continually proves to be a recipe for Travel Plan failure and is often why travel planning is so poorly regarded by decision makers at a local level.
- 2.3.3 The methodology within the Travel Plan - to fulfil vision-led principles – is not a ‘wait-and-see’ approach, but one of being proactive which must firstly: a) demonstrate how the site will meet the mode shares forecasted in the TA, and b) commit further funding to addressing inadequacies of infrastructure where these mode shares are *not* met. In the absence of either (or both) of these features, and/or the failure to meet the mode shares pledged, the TA forecasts are evidentially unsound.

3.0 Off Site Infrastructure

- 3.1 As per the concerns raised above, ATE expects the applicant to deliver / fund a comprehensive off-site improvements package, relevant to the proposals in question and in the interests of upholding the pledges it makes around active travel and vision-led sustainable development within its TA.
- 3.2 Taken from **TN02 Appendix C**, the following forecast data has been extrapolated:

Forecast daily active travel movements

Location / Route	Pedestrian Movements (daily)	Cyclist Movements (daily)
To / from Christs Hospital Station	28	16
To / from Leisure Facilities	146	5
To / from Two Mile Ash Road (towards Horsham)	Not provided	
Towards Christs Hospital Station TOTAL	174	21
North via Hop Oast Roundabout	290	58
Worthing Road (north of central access)	575	76
Worthing Road (south of pedestrian access)	149	32
Worthing Road (north of Chessall Avenue)	330	50
Worthing Road TOTAL	1,054	158
Cedar Drive (east of Worthing Road)	351	85
Towards Lintot Square (route unclear, but assumed via Chessall Avenue / Worthing Road and/or Kensett Avenue / Downs Link / Fairbank Road)	520	159

3.3 Route to Christs Hospital School and Railway Station

- 3.3.1 Following further analysis and discussion at a recent meeting, ATE's view is that this route should be sufficiently upgraded to provide non-motorised access to the rail, education, leisure and employment destinations that are located along it, and in particular the Christs Hospital Station, in addition to the leisure uses and the 400+ employment opportunities that are provided at the school. Low existing usage or forecasts (based on existing behaviours) are not a reason to overlook or discount providing a high-quality linkage when a new community of around 2,500 inhabitants is proposed at such close proximity.
- 3.3.2 The alternative rail connection - Horsham station - is via a 15–20-minute walk to catch a bus from Worthing Road and then a 25-minute bus journey to Horsham before a 5-minute walk to the relevant station platform. This journey time and reliability of the bus journey from Southwater to Horsham station will be further impacted by any delays caused by peak hour congestion occurring around the A24 and within Horsham itself, while this assumption relies on the bus and rail timetables being fully integrated so as to be complimentary at both ends of the journey.
- 3.3.3 In view of these variables, a minimum 40-minute journey to reach a train with the potential for bus delays and unreliability appears optimistic when compared with alternative options and ATE considers it more than likely with the current infrastructure that future residents will instead drive from the development to Horsham or Christ's Hospital stations, given the shorter car journey-time and the opportunities for parking close to each station.

- 3.3.4 Alternatively, and when compared with a walk / cycle ride (of 20-30 mins / 10 mins) to Christs Hospital Station that would: a) not be subject to any delay, b) offer far greater journey time reliability; c) incorporate exercise into commuters' daily routines, d) be entirely absent of bus fare, fuel or parking costs, and e) minimise peak hour traffic impacts, it is clear that the policy-compliant approach is the upgrading of this route in the interests of providing modal choice and giving first priority to sustainable modes in alignment with **NPPF parags 110, 115 and 117**.
- 3.3.5 ATE notes and supports the intention to address this route, although little confidence can be taken from the submitted **drawing: 0106-01 Rev P01**, which is reliant on a 1:1,000 OS base which continues to raise more questions than answers. Nevertheless, the intention to deliver something along Christs Hospital Road is apparent and would benefit from greater ATE involvement in addition to a topographical survey.
- 3.3.6 An absence of lighting will not be supported along this route if it is expected to serve commuters and other users of the rail network. Secondly, ATE continues to question the absence of a more direct pedestrian / cycle connection from the northwest of the site, where the red line boundary lies contiguous with the highway boundary and where a more imaginative carriageway treatment could work that goes beyond simple interventions.
- 3.3.7 As has been raised previously, this requires a rethink of the placemaking as well as the management and nature of this location following the addition of a built up area to the east, rather than assessing this through the current lens. ATE notes that the red line boundary of the site crosses over the highway at a point where there is little / if any vegetation and where a more imaginative approach could be delivered. Some examples of potential treatments and interventions are provided below.



3.4 Two Mile Ash / Tower Hill

- 3.4.1 Some of the above treatments are proposed along Christ's Hospital Road and further north along Two Mile Ash and Tower Hill, although in respect of the latter, it would appear that this route returns cyclists to the fast and straight B2237 Worthing Road into Horsham, instead of utilising / upgrading the public right of way over the railway bridge to reach Longfield Road, which ATE previously requested further consideration of. For obvious reasons, the B2237 is in no way conducive to cycling to those who are not already experienced competent cyclists.

3.5 Worthing Road

- 3.5.1 ATE retains the view that this corridor requires to be addressed holistically in order to have any influence on modal shares towards what is forecast. The evidence presented supports that the development will generate movements along the route as well as across it and the numbers presented are not insignificant, especially as many will include schoolchildren.
- 3.5.2 The provision of a 2m footway along the western side of Worthing Road close to the access to the site is noted and supported in principle. However, ATE considers that the nature and behaviour of traffic is equally important and recommends the consideration of a 20mph rather than a 30mph speed limit with accompanying features if this street is to be considered safe for the level of daily walking and cycling movements forecasted by **TN02**, and reflecting the future use of this route by children. Accordingly, and in view of the close proximity to schools, better crossing facilities than informal refuges may be necessary, and ATE would suggest that at least one of the informal crossings is replaced by a zebra crossing to reflect desire lines from the east.
- 3.5.3 As previously, further minor improvements continue to be proposed along Worthing Road with the exception of a proposed puffin crossing to accompany the PRoW just north of Southwater Street and works necessitated by the provision of a new access off Chessall Avenue further south (see below).
- 3.5.4 The suggestion of a parallel zebra crossing on the northern arm of the Worthing Rd / Chessall Ave / Cedar Grove roundabout is supported in principle, although this should be accompanied by upgraded crossings on other arms of the roundabout, given the multiple destinations that this junction acts as a conduit for.
- 3.5.5 Elsewhere, ATE is grateful for the assessments made by WSP on route quality, in the context of movements to and from the development and retains its concerns around the safety of Worthing Road and the lack of safe facilities for cycling along the carriageway or providing sufficient width and level of protection for pedestrians.
- 3.5.6 While it is concluded that there is limited width to meet preferred design practice for segregation which would be required in accordance with traffic volumes, a suitable compromise would be to request s106 contributions towards addressing **Figures A8 and A9** of the **Horsham LCWIP** through funding of the measures described in **Tables A5 and A6**. This would move discussions forward towards a positive recommendation and would take account of the additional movements generated, but also considering:
- a) replenishing and updating the existing traffic calming features;
 - b) adding further measures (vertical or horizontal deflection), as appropriate;
 - c) focussing on upgrading the surface quality of footways and carriageway, taking into account the needs of disabled people;

d) introducing a consistent 20mph speed limit to improve conditions and encourage cycling along the carriageway

3.6 Northern access to A24 Hop Oast Roundabout, Worthing Road and relationship to Golf Course development

- 3.6.1 ATE is grateful for the further attention paid towards infrastructure to the north of the development in line with emerging policy, and makes the following observations on the recent drawings presented:
- 3.6.2 ATE concurs with and supports the provision of a 4m shared path (as opposed to a segregated 5m facility) given that the latter would bring cyclists closer to fast moving traffic and offer insufficient visual or physical protection. As such, the more qualitative approach of a slightly narrower shared path alongside a wider 1-metre landscape planted buffer zone is supported.
- 3.6.3 The buffer zone must not however be a mown grass (or mud) strip, but must deliver a more significant and visual separation from the carriageway, similar to the planting treatments shown here along the A27 outside Lewes. ATE would recommend that the securing of such treatments is explicitly stated on any approved drawings and accompanying conditions to ensure this requirement comes to fruition and avoids simply becoming an area of grass verge.
- 3.6.4 Regarding the timing of the above works and to meet the objectives of linking to Horsham, the continuation of this route into the town via Pedlar's Way (Lovers Lane) and further north, as anticipated and approved by the Inspector on the Golf Course site to reach Horsham via Chesworth Lane / Queensway is entirely reliant on three further actions:
- the commencement of the golf course development,
 - the acquisition of the £198,960 of s106 funding by WSCC (payable upon commencement) for the upgrading of the above route, and
 - the delivery of those upgrades by WSCC.
- 3.6.5 ATE recommends that these works are effectively co-ordinated to ensure access from the Southwater development to Horsham benefits from this linkage as soon as is practically achievable in the interests of encouraging sustainable travel from the outset of development, not only in relation to offering sustainable choices to the new residents, but also the students and employees that will need to access this site from the direction of Horsham (beyond the golf course development) in the future.

4.0 **Masterplanning and Permeability**

4.1 Public Rights of Way treatments

- 4.1.1 ATE is grateful for consideration of surface treatments at this stage and these are clearly and helpfully set out in the **DAS pages 75-76**. ATE supports the provision of bound surfaces along **PRoWs 1655** and **1656** but cannot accept any loose or self-binding treatments along **route 223** (which comprises part of the National Cycle Network **Downs Link**), should this be intended. If the Downs Link is to serve the purposes expected of it by this development, its surfacing requires to be of bound tarmac throughout (if not already), between the settlement of Southwater and the Christs Hospital Station.

- 4.1.2 **Route 1662** to the west of the secondary school may be more suited to a more informal surfacing, although the section along the school's southern boundary is likely to be relied upon to link to housing to the south and requires bound surfacing if this is to be the case. It is better that this commitment is made now and withdrawn upon further examination if necessary at reserved matters than having to make the same request once more.
- 4.1.3 In respect of **routes 1658** and **1660**, where these routes pass through the new built up area and provide key linkages between homes and local facilities, they need to be properly surfaced and accessible and inclusive and not subject to the deterioration that occurs on loose or self-binding solutions, otherwise they will present a barrier to users of buggies, wheelchairs and mobility scooters. This would be discriminatory to those users and will be particularly apparent during winter months due to water ingress, pooling and silting. Part of **1660** will provide access to the primary school and so the suggestion that this can be loose-bound is wholly inappropriate.
- 4.1.4 Gravel and hoggin paths do not deliver inclusive and accessible environments while denying certain user groups much-needed and valued access to open space and the countryside. If visual impact is a concern, the use of buff-coloured surfacing is entirely possible and acceptable and has been used in countless other similar situations.

4.2 Specification of internal active travel routes

- 4.2.1 Regrettably, and for a second time, ATE must repeat its concerns over what appears a vague approach to the specification of internal walking and cycling infrastructure, particularly along the central Village Way route running north-south through the development, where illustrations indicate a mixture of shared use and segregated pedestrian / cycle paths, but where the *specific* dimensions of these routes are missing from the accompanying text and diagrams. This is not acceptable, risks the provision of cyclists sharing with pedestrians along the main route and will do little to encourage cycling while causing anxiety to those walking and wheeling at all times of day.
- 4.2.2 This matter is not covered in **TN02**, nor can any comfort be gleaned from the parameters plan, the movement strategy or the character areas chapters of the **DAS**. Unless a specification along the main routes that segregates pedestrians and cyclists to a minimum of 2m and 3m respectively is confirmed, with suitable separation suggested, ie: setts, strips, or other visual / paved delineation (ie. not a solid white line) the internal masterplanning will contradict the promotion of the internal route as a safe alternative to cycling along Worthing Road. This assumption carries next to no weight if cyclists are expected to share footways with pedestrians. This is a matter that requires to be addressed as part of the outline application and not left to repeated and tiresome arguments at the reserved matters stage.

5.0 On-Site Facilities – Cycle Parking

- 5.1 In relation to cycle parking - good practice is to make cycling as convenient and attractive as possible, in view of all the other many barriers and hurdles there are to safe cycling in the surrounding area, many of which are covered in this document.
- 5.2 This starts with facilities at the home. As such, cycle parking could not and should not be relegated to rear garden 'afterthought' shed provision, particularly when the

housing market is comparably very willing to locate car parking a convenient distance from the front door of houses and with direct access to the highway.

- 5.3 A development that follows policy and delivers on vision-led would recognise the requirement to fulfil **NPPF paragraphs 115** and **117** to give *first* priority to active travel modes and seek solutions, and at an early enough stage to fulfil this requirement, and therefore incorporate them within its DAS or any subsequent design coding or discharge of condition, rather than delaying discussions to reserved matters, where active travel practitioners are often told it is '*too late*' to address or make changes.
- 5.4 ATE is happy to work with the applicant and its consultants to share examples of good practice that can apply as equally in this location as have been delivered elsewhere in the country. Ignorance to this provision at an early enough stage merely perpetuates the afterthought garden-shed provision which has become widespread and which evidence shows has done very little - if anything - to promote cycling as a valued and attractive alternative to continued sedentary forms of travel, as is evident from the baseline mode shares published in the applicant's TA and Travel Plan.

6.0 Next steps

- 6.1 ATE does not feel it necessary for another lengthy *response to ATE* document but considers that further verbal dialogue with the applicant and WSCC is necessary to address the issues raised above and reach a favourable solution that goes further than the current offer in ensuring the applicant meets its pledges and government policy in respect of delivering a vision-led development that gives *first* priority to safe and attractive active travel infrastructure, both on-site and in the surrounding area, as explicitly required by government policy in **NPPF parags 96, 110, 115, 117 and 135**.