



Active
Travel
England

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

Your Ref: DC/26/0322
Our Ref: ATE/26/00498/FULL
Date: 14 April 2026

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

From: Planning & Development Division, Active Travel England

To: Horsham District Council

Application Ref: DC/26/0322

Site Address: STEYNING GRAMMAR UPPER SCHOOL, SHOOTING FIELD,
STEYNING, BN44 3RX

Description of development: Part-demolition of existing teaching buildings, MUGAs and all-weather pitch. Construction of replacement 2-storey and 3-storey teaching buildings, flood-lit all-weather pitch, and hard surfaced sports courts, with associated access, parking, landscaping, and infrastructure.

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

- c. **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. Overview and Recommendations

- 1.1. Active Travel England (ATE) welcomes the opportunity to provide comments on the above submitted full planning application. The proposed educational facility would consolidate the four sites operated by Steyning Grammar School into one site at Shooting Field, with a proposed school capacity of 2,400 pupils, and 235 staff members.
- 1.2. **West Sussex County Council's (WSCC) Active Travel Strategy, paragraph 5.2.3** sets out that its aim is to nurture a culture that reduces car trips for the journey to and from school, and increases walking, wheeling, and cycling. **National Planning Policy Framework Paragraph (NPPF) paragraph 115** states that it should be ensured that sustainable transport modes are prioritised, and that safe and suitable access to the site can be achieved for all users. The application provided is currently insufficient to meet these policy objectives, given the lack of consideration of walking, wheeling, and cycling in the Transport Assessment (TA). There is a significant opportunity to provide measures that will drive active travel trips to the proposed development, particularly given the rural location and lack of public transport options.
- 1.3. ATE recommends the applicant undertake the following:
 - Revise the TA, to provide a multi-modal, per hour, trip rate representative of travel habits across the school year, and considering the multi-purpose use of the site, to establish a robust evidence base, in line with **NPPF paragraph 109**.
 - Produce a Framework Travel Plan, containing ambitious mode share targets for walking, wheeling, and cycling, and outlining the infrastructure priorities required to deliver on them.
 - Provide a catchment plot for the proposed site for walking and cycling, map key active travel routes to the proposed development, and undertake a **Walking Route Audit** and **Cycle Level of Service** assessment to assess their condition, their infrastructure requirements (utilising **Steyning Parish Council's Local Cycling and Walking Infrastructure Plan (LCWIP)**), and opportunities for implementing "School Streets."
 - Reconsider Horsham Road's use as an active travel route, assessing speed reduction and traffic-calming options.
 - Secure on-site boarding/alighting for both directions of Route 100, and contribute towards upgrading Shooting Field Road bus stops to **Local Transport Note (LTN) 1/24 (Bus User Priority)** standards.
 - Redesign internal pedestrian routes to be direct, safe, and inclusive, avoiding conflicts with vehicle movements, including provision of a clear, continuous pedestrian link through the car park to the promoted Shooting Field entrance.
 - Increase cycle parking to meet **LTN 1/20 (Cycle Infrastructure Design)** minimum standards and provide appropriate trip-end facilities (showers, lockers, changing rooms).

2. Planning Application Assessment

Trip Generation, Trip Attraction and Travel Plan

- 2.1. The applicant's TA does not provide a representative assessment of trip generation or attraction. Reliance on baseline surveys conducted in November 2025 result in a forecast active travel mode share of 31% for pupils (TA Table 5-2) and 8% for staff (TA Table 5-1). These figures underpin the calculation of existing and future vehicular trip attraction (TA Tables 5-4 to 5-6) across the school AM, school PM, and highway PM peaks. This approach runs counter to **NPPF paragraph 109**, as it reinforces existing patterns through a predict-and-provide methodology centred on peak-hour traffic, rather than adopting a vision-led approach that aims to improve upon the above figures and supports well-designed, sustainable places and prioritises active and public transport.
- 2.2. Consequently, the trip distribution considers only vehicle trips, with no assessment of multi-modal travel or the infrastructure needed to support walking, wheeling, and cycling. The TA also omits analysis of movements outside peak hours, despite breakfast clubs, after-school activities and wider community use generating additional demand.
- 2.3. Notably, neither the TA nor the Travel Plan provides forecast mode shares, which does not follow **MHCLG Travel Plan Guidance**. It is therefore considered that the applicant has failed to prioritise sustainable transport modes, particularly walking, wheeling, and cycling, and as such the submission is non-compliant with **NPPF paragraph 117**.

Off-site Infrastructure – Active Travel

- 2.4. Within its Travel Plan, the applicant acknowledges that this is a very large school with a wide catchment area, and limited transport options. However, **LTN 1/20 paragraph 2.2.2** sets out the potential for cycling, stating that two out of every three personal trips are less than five miles in length, an achievable distance to cycle for most people, and that for schoolchildren the opportunities are even greater. Cycling has the potential to fill gaps in public transport provision in this rural area, particularly for pupils and staff from Steyning, Bramber and Upper Beeding, with potential to reach Henfield and Shoreham-by-Sea. Recent improvements implemented by WSCC (TA 2.3.7) further strengthen the opportunity to promote active travel to the proposed development.
- 2.5. The applicant holds pupil postcode data (TA Table 6-10) which would allow it to visualise popular routes for walking, wheeling, and cycling as part of its trip generation/attraction. Despite this, it has not carried out a **Walking Route Audit** or **Cycle Level of Service** assessment of the existing active travel network to the proposed development. This represents a failure to prioritise active travel in line with **NPPF paragraph 117**, and the applicant should undertake these to identify infrastructure needs (utilising Steyning Parish Council's LCWIP) and opportunities for 'School Street' implementation.
- 2.6. With regard to Horsham Road in particular, the applicant states that access is restricted, and therefore the promoted pedestrian route to the proposed development is via the Shooting Field access (TA 2.3.1). This approach conflicts with **LTN 1/20 paragraph 14.3.11**, which recommends that new

developments are well connected to their surroundings with a choice of routes. Similarly, **LTN 1/20 paragraph 4.2.8** outlines that cycle routes should be at least as direct – and preferably more direct – than those available for private motor vehicles. It is therefore inappropriate to designate a single preferred route.

Off-site Infrastructure – Public Transport

- 2.7. ATE supports the applicant's efforts to secure an arrangement with the operator, Compass Bus, to enable on-site boarding and alighting for the Route 100 bus, and considers that this should apply to both northbound and southbound services given the poor quality of bus stop facilities on both sides Horsham Road. ATE also considers that the applicant should negotiate a contribution with Steyning Parish Council to improve bus stop facilities on Shooting Field Road to ensure they are compliant with **LTN 1/24**, and accessible for all users.

Masterplanning and Permeability

- 2.8. The proposed internal layout of the site does not provide a high-quality or inclusive walking environment, particularly for community users accessing the proposed development's sporting facilities. Neither the Shooting Field nor Horsham Road access offers a route that is direct, comfortable, safe, or coherent, in line with the principles set out within the **Walking Route Audit Tool**. Both rely on routes that conflict with vehicle movements, and require unnecessary changes in level, reducing accessibility and overall pedestrian safety.
- 2.9. DAS 5.3 states that pedestrians will utilise Horsham Road to reach the leisure centre and reception, despite the applicant having discounted this route within the TA, as discussed at paragraph 2.6. The applicant also refers to enhancing an existing, but indirect, footpath to enable pedestrians to exit the car park. However, no clear or continuous pedestrian route is provided through the car park to connect with the Shooting Field entrance, which is the applicant's promoted pedestrian access. This lack of legibility and continuity undermines the quality and safety of the proposed internal layout.

Cycle Parking and Trip-End Facilities

- 2.10. At TA 3.4.4, the applicant states it intends to provide 120 cycle parking spaces as part of a pupil cycle store, and a staff cycle store which will provide 10 spaces. Both cycle stores will be located to the north of the vehicular access on Shooting Field, and be sheltered, secure and covered by CCTV. ATE welcomes the focus on the security of cycle parking, however, **LTN 1/20 Table 11-1** sets out that the minimum cycle parking capacity for educational institutions should be 1 space per 20 staff, and 1 space per 10 students. Therefore, additional provision is required to meet this standard.
- 2.11. **LTN 1/20 paragraph 11.7.2** sets out that places of work should consider changing, shower and locker facilities to support cycle commuting, particularly for those who are riding longer distances. The applicant has not identified any such facilities within the application.