



Active  
Travel  
England

Active Travel England  
West Offices  
Station Rise  
York  
YO1 6GA

Your Ref: F/19/25/OUT  
Our Ref: ATE/25/00932/OUT  
Date: 30 December 2025

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

From: Planning & Development Division, Active Travel England

To: Arun District Council

**Application Ref:** F/19/25/OUT

**Site Address:** LAND TO THE SOUTH OF, FORD LANE, FORD, BN18 0DF

**Description of development:** New description: Outline planning application with all matters reserved (except access proposed along Ford Lane) for development of up to 400 No dwellings, a 8-10 form entry secondary school with associated sports pitches and facilities, a community hub building of up to 600 sqm, new pedestrian and cycle routes, Public Open Space, sustainable urban drainage system, landscaping and associated infrastructure. This application lies within the parish of Ford and Yapton, affects the setting of listed buildings, affects a Public Right of Way and is a Departure from the Development Plan. This is a CIL liable development. (Old Description: Outline planning application with some matters reserved (except access) for up to 400 No dwellings, an 8-10 form entry secondary school with associated sports pitches and facilities, a community hub of up to 600 sqm, new pedestrian, cycle and vehicular access point onto from Ford Lane with additional secondary pedestrian/cycle access points will be provided throughout the site, allotments/community growing space, an orchard, country park, a sustainable urban drainage system and other formal public open space, landscaping and associated infrastructure. This application also lies within the parish of Yapton, affects the setting of listed buildings, affects a Public Right of Way and is a Departure from the Development Plan.)

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

- a. **No Objection:** ATE has undertaken a detailed assessment of this application and is content with the submission.
- b. **Conditional approval:** ATE recommends approval of the application, subject to the agreement and implementation of planning conditions and/or obligations as set out in this response.

- 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.
- d. **Refusal:** ATE recommends that the application be refused for the reasons set out in this response.

## 1.0 Background

Active Travel England (ATE) welcomes the opportunity to provide comments on this further consultation. ATE previously submitted a response dated 31 July 2025 of deferral, seeking further clarification on several matters.

ATE has now received the Transport Assessment Addendum (November 2025), which seeks to address the issues previously raised by ATE.

It is also understood that this application is scheduled to be considered at Planning Committee on 14 January 2026. Whilst ATE continues to seek a deferral of its decision, it should be noted that no in-principle objections are raised. The outstanding concerns relate primarily to design and layout matters, particularly where opportunities to prioritise active travel, in line with the 'Vision', appear absent from the current proposals. Further context for this position is set out below.

## 2.0 Summary

### 1. Trip Generation Analysis

ATE previously requested that daily trip figures for walking and cycling be provided, rather than peak-hour data alone, to better understand active travel demand throughout the day.

The applicant has now provided this information in Table 5.1, which indicates the following modal split:

- Active travel (walking and cycling): 43.8%
- Car-based travel (driver and passenger): 40.9%

Whilst it is acknowledged that these figures include trips associated with the secondary school, they nonetheless demonstrate a high level of pedestrian activity across the site.

Based on an average across the day between 07:00 and 19:00, this equates to approximately 122 pedestrian arrivals per hour and 122 pedestrian departures per hour. More broadly, during the AM peak hour (08:00–09:00) the development could generate around 350 two-way pedestrian trips per hour (approximately 175 arrivals and 175 departures), rising to around 410 two-way pedestrian trips per hour in the PM peak (15:00–16:00 / 16:00–17:00) (approximately 205 arrivals and 205 departures).

These levels of pedestrian movement clearly demonstrate the need to prioritise high-quality pedestrian facilities, both within the site and on the surrounding network.

## Travel Plan Targets

ATE raised concern that, by the end of the five-year Travel Plan period, only 7% of trips are forecast to be made by cycle and 12% on foot.

The applicant has responded that a more accurate modal split target will be identified once an initial baseline survey has been undertaken, and is therefore unwilling to fix walking and cycling mode share targets at this stage.

Whilst this is disappointing, and early ambition is important, subject to the robust implementation of the proposed Travel Plan measures to encourage active travel, ATE is willing to accept this approach on this occasion.

## 2. Accessibility

ATE raised concern regarding the limited number of facilities within 800 metres of the site. The most up-to-date benchmark for assessing walkability is set out in paragraph 115(c) of the NPPF, with reference to the National Design Guide.

The applicant has cited a range of alternative guidance and research to justify walking distances of up to 2 km, or in some cases even greater. Whilst ATE would not support walking distances beyond 2 km, the most practical consideration is whether routes are of a sufficiently high quality to support walking comfortably and safely. Route quality and opportunities therefore remain a critical consideration.

## 3. Active Travel Route Audit (ATRA)

Whilst noting the submitted Desire Line assessment, ATE advised that a formal Active Travel Route Audit (ATRA) would be required to fully assess the quality of existing routes.

The applicant has confirmed that a site visit undertaken prior to submission of the Transport Assessment considered relevant criteria and concluded that surrounding routes were suitable for use.

It is also noted that the Highway Authority requested a Non-Motorised User Audit. In response, the applicant has again referred to the existing Transport Assessment, which concluded that the network would either be significantly improved by other consented developments or was already of a good standard. The extent of off-site improvements secured by other developments was set out within the submitted TA.

## 4. Off-Site Active Travel Infrastructure Improvements

ATE welcomed the principle of off-site measures but questioned:

- Whether the proposed improvements are proportionate; and
- Whether the scheme is over-reliant on third-party developments outside the applicant's control.

The applicant confirms the delivery of:

- Two new crossings (Burndell Road and North End Road); and
- An upgraded PROW 363-1, connecting to Barge Close and Yapton town centre.

No further off-site improvements are proposed.

## **Site Access - Footpath**

The applicant is not proposing to provide a footpath along the Ford Lane frontage, instead stating that a segregated pedestrian route within the site boundary will be provided away from the carriageway. This approach is said to reflect the rural character of Ford Lane and to align with the strategy accepted for the Ford Airfield development.

ATE notes, however, that development proposals to the east have provided a footpath along the site frontage, and the absence of a continuous footway here will result in a lack of coherence.

Notwithstanding the approach taken at Ford Airfield, ATE remains concerned that the proposed internal footway would lack continuity and comfort. The Illustrative Layout shows a large green buffer between the site and development to the west, and the routing of the path may lack natural surveillance and perceived safety. Whilst a route along Ford Lane may be affected by vehicle movements, it would benefit from greater passive surveillance.

ATE considers that both a frontage footway and internal pedestrian routes would be of significant benefit given the scale of the proposals and uses on site.

## **Cyclists**

ATE has highlighted that no cycling infrastructure is proposed along Ford Lane, despite the applicant acknowledging that it is used by cyclists. The applicant's response focuses on development-related journeys rather than existing cycling movements, which will be affected by changes to the road layout.

Measures to provide some degree of betterment for cyclists should therefore be considered, such as tightening junction radii and providing advisory markings to alert drivers to the presence of cyclists across the junction.

## **Public Rights of Way (PRoWs)**

Improved connections to PRoWs are proposed. Subject to ongoing agreement and dialogue with the appropriate authorities, ATE raises no further concerns on this matter at this stage.

## **5. Permeability and Placemaking**

### **Permeability**

ATE raised concern that limited pedestrian and cycle links are shown between the application site and the Landings, resulting in poor permeability.

The applicant acknowledges that the Illustrative Masterplan shows only a single connection and states that additional connections will be addressed at reserved matters stage. This approach is generally not supported and the Illustrative Masterplan should show indicative connection points, which can then be secured in detail at reserved matters. Furthermore, the lack of connectivity into Meadow Gardens is of concern, particularly given the existing lack of east–west movement across the site frontage.

There appears to be an obvious connection opportunity extending east from Neptune Way into the application site, which would establish a natural movement pattern in accordance with National Design Guide M1, which promotes connected networks of routes for all modes.

Appendix D of the Addendum shows three connections, which should therefore be committed to at this stage, alongside connections to PRoWs. Additional connections are also shown within Figure 17 (Revised Illustrative Masterplan – Pre-Application) in the Design and Access Statement, however it is unclear why these have not come forward.

## Cycle Facilities

ATE recommended that dedicated, segregated cycle infrastructure should be provided on both sides of the main spine road, rather than a 3.0 m shared facility. Whilst lower vehicle speeds are noted, the presence of a secondary school and the stated ambition to encourage cycling justify the provision of higher-quality, segregated infrastructure. The applicant refers to Table 6-3 of LTN 1/20, stating that a 3.0 m wide shared footway/cycleway may accommodate up to 300 pedestrians per hour. However, paragraph 6.5.6 of LTN 1/20 clearly sets out only limited circumstances in which shared use may be appropriate.

It has also been suggested that during the AM peak hour the development could generate up to 972 two-way pedestrian movements. Whilst the applicant argues that these movements would be distributed across a number of routes within the site, the Illustrative Layout currently shows the primary road as the sole connection to the school. On this basis, it is difficult to justify assumptions regarding the distribution of pedestrian movements at this stage.

Given that pedestrian flows could therefore exceed the thresholds set out in LTN 1/20, and in the absence of clearly demonstrated alternative routes, segregated cycle tracks should be considered.

In this context, ATE also notes the applicant's stated objectives that "*our vision is to create a sustainable and integrated transport network within a masterplanned neighbourhood, designed taking into account current best practice guidance*" and that "*the transport strategy will prioritise active travel*". ATE therefore refers to best practice within the National Model Design Code, which states that "*all new streets other than local and tertiary streets should include separate cycle lanes*". The current proposals do not demonstrate compliance with this guidance.

## School

Further comments on the design and layout of the school will be provided at reserved matters stage.

## Materials

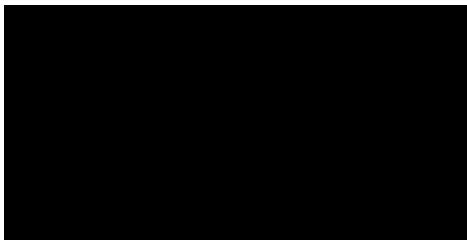
Further comments on materials will be provided at reserved matters stage.

## 6. Cycle Parking

Further comments will be provided on cycle parking at reserved matters stage



## PI- Consultation- Active Travel England Response



Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF

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### Our priorities...



**From:** Active Travel England Planning

**Sent:** 30 December 2025 13:42

**To:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Subject:** LPA Reference: F/19/25/OUT Detailed Response

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**ATE Case Officer:** William Everson

**ATE Case Officer Email:** [REDACTED]

Thank you for your email

Active Travel England, after reviewing the submitted proposals and their potential impact has provided a detailed response containing specific recommendations. Please find attached the following:

- Detailed Recommendations

*ATE would like to be notified of the outcome of the application through the receipt of a copy of the decision notice, in addition to being notified of committee dates for this application.*

Kind regards



Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

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