



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: 31 July 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 comment on this application.

It is understood that the site is not allocated in the Local Plan, although it was submitted for inclusion.

To date, ATE has not been involved in any pre-application or planning application discussions relating to this site.

ATE has reviewed the application against the criteria set out in our updated Planning Assessment Toolkit, national policy, and active travel design guidance.

Following our review, the following key issues require further consideration, informing a deferral response:

2.0 Summary

1. Trip Generation Analysis and Travel Plan Targets

Trip Generation

Table 5.5 of the Transport Assessment (TA) provides estimates of peak-hour trips by mode, which is welcomed. However, to fully understand the anticipated impact on surrounding infrastructure, daily trip figures for walking and cycling—not just peak-hour data—should also be presented. This data could not be identified in the TRICS outputs within the TA appendices. Regardless, analysis in the main body of the TA is essential to properly assess active travel demand, particularly given the acknowledgement in paragraph 5.15 of the TA regarding future demand. As it stands, the TA does not provide a full picture of all-day demand.

Travel Plan

Table 4.2 of the Travel Plan sets out target mode shares over a five-year monitoring period, using 2011 Census data as a baseline. By the end of the five-year period, only 7% of trips are forecast to be made by cycle and 12% on foot. This represents a 7% increase in active travel. Overall, the Travel Plan targets suggest that the development will remain heavily reliant on private vehicles for trips beyond the site. The applicant should consider how these targets meet the vision-led expectations (by utilising 2011 data only) of the updated NPPF, particularly with regard to the provision of new and improved infrastructure to support journeys by active modes.

It is noted that targets will be reviewed following the initial travel surveys. However, it is essential that the mode share targets for walking and cycling are not reduced following future surveys.

It is also disappointing that no initial targets have been provided for the school-based Travel Plan. There is an opportunity at this stage to commit the school to high levels of sustainable travel. Relying on surveys after the school opens risks setting an unambitious baseline if early travel patterns are car-dominated.

2. Accessibility

Walkable neighbourhoods are generally defined as those where key services can be accessed within a 10-minute walk (approximately 800 metres). This distance is referenced in the National Design Guide and the NPPF. While a threshold of up to 2 km may be acceptable in some cases, it is unrealistic for many users, particularly children and those with limited mobility.

Table 3.1: Local Amenities in the TA shows that no facilities—other than the Maypole Inn, Yapton—are located within 800 metres. The applicant has identified amenities to be delivered as part of the Ford Airfield development that will be closer, but these are dependent on both their delivery and pedestrian and cycle links to ensure routes are direct and within the expected distances. Further comments are provided on this matter below.

It is recognised that the proposals will provide some on-site services, namely a secondary school. However, for the site to be considered sustainable in the context of NPPF paragraph 110, surrounding developments must be completed and accessible prior to the occupation of this scheme so that positive travel habits can be established from the outset. Although existing facilities fall within what might be considered the maximum reasonable distance, ensuring that routes to these services are of a high quality will be crucial.

Buses

The applicant notes (paragraph 3.41 of the TA) that the closest bus stop is on Burndell Road to the west of Fordwater Gardens, accessed via a footpath through Fordwater Gardens and Navigation Drive. The walking distance from the southern pedestrian access is approximately 500 metres. Guidance published by GoAhead and Stagecoach in 2025 is referenced as suggesting that bus stops should be within 500–800 metres of homes. ATE's general expectation is that bus stops are within 400 metres of all dwellings. The applicant should confirm whether the referenced GoAhead and Stagecoach guidance has been accepted as an appropriate standard for decision-making. It is also important to ensure all dwellings are in an acceptable distance, not just one access. The quality of the walking routes to the bus stop must also be considered, not just distances.

Rail

The site is within a reasonable cycling distance of local rail stations. Again, the quality of routes to these stations must be assessed as part of site accessibility, supported by photographs and an assessment against relevant active travel guidance.

3. Active Travel Route Audit

The TA includes a section on 'Accessibility by Sustainable Transport Modes'. While this identifies distances to key destinations and some existing infrastructure, it lacks a detailed,

route-based assessment of access to key services by walking, wheeling or cycling. The 'Desire Line' assessment goes some way towards providing this, but there is no evaluation of whether these routes meet the standards set out in *Inclusive Mobility* or LTN 1/20, nor whether planned improvements will achieve these standards.

ATE recommends that a full Active Travel Route Audit is undertaken using the ATE Planning Application Assessment Toolkit. This should include annotated maps, photographs, and an assessment of key routes against the following criteria:

- Safety
- Directness
- Convenience
- Accessibility

Reference should be made to:

- The National Design Guide
- LTN 1/20 design principles (coherence, directness, safety, comfort, attractiveness)
- Inclusive Mobility (2022)

Schemes outlined in local walking and cycling plans (such as LCWIPs) should be taken into account, with opportunities for infrastructure improvements integrated into the development. Consideration should also be given to the Arun Active Travel Connectivity Study Report and specific projects, such as the Arundel to Ford Road walking and cycling route.

4. Off-site Active Travel Infrastructure Improvements

The application relies heavily on off-site measures previously secured through other developments. It is important to ensure that these measures can adequately facilitate active travel and that the scheme is not overly dependent on improvements outside the control of this application.

The TA lists the following proposed mitigation:

- A zebra crossing on Burndell Road
- A signal-controlled pedestrian crossing on North End Road

Whilst these improvements are welcome, it is unclear whether they are proportionate given the scale of the development. As there is significant reliance on consented off-site improvements, mechanisms should be in place to secure access routes if these improvements do not come forward.

Site Access

Footpath

The TA confirms that the site will be accessed via Ford Lane, where there is currently no formal pedestrian infrastructure. Approximately 150 metres west of the site access a footway begins on the southern side of the carriageway, linking to Meadow Gardens. However, the footway is incomplete, requiring pedestrians to walk in the carriageway. The applicant has suggested an internal route to address this issue.

It is unclear why the footway cannot be extended along the full site frontage. The proposals will urbanise the area and appropriate pedestrian infrastructure along the highway should be provided to support anticipated growth. The detailed plans do not indicate how pedestrian movements will be managed at this location, with only indicative drawings in the illustrative masterplan showing a footway. This provides no guarantee that it will be delivered.

Cyclists

The applicant refers to a Strava heatmap to demonstrate that Ford Road is used by cyclists but provides no assessment of whether the site access arrangements will affect them. No measures have been proposed to improve conditions for cycling along Ford Lane, which is heavily trafficked. The proposed access includes a wide ghost right-turn lane, significant hatching, and wide radii—features which prioritise vehicle flow. Consideration should be given to the needs of cyclists and the design should better reflect the residential character of Ford Lane and the guidance in *Manual for Streets*.

The applicant also notes: “*To facilitate access to the site, the speed limit in the vicinity of the junction will be reduced to 30 mph. This will be agreed as part of a TRO.*” It would be helpful if the applicant could confirm the length of road this TRO will cover.

Public Rights of Way (PRoWs)

It would be helpful if detailed drawings were provided for all proposed PRoW improvements and connection points.

5. Permeability and Placemaking

Permeability

Pedestrian and cycle connectivity between sites should be prioritised in accordance with NPPF paragraph 96a. The Illustrative Masterplan currently shows only a single ‘Gateway Point’ into the Landings development. No clear connections are shown between Landings and this site, which is a significant concern and risks undermining active travel connectivity and permeability. These links must be secured, and the applicant should confirm the status of any land agreements and set out contingency measures if these links cannot be delivered. Impacts on accessibility and journey times should also be assessed.

Cycle facilities

Dedicated, segregated cycle infrastructure should be provided on both sides of the main spine road rather than a 3.0 m shared facility. Although vehicle speeds and flows are expected to be low, the presence of a secondary school will increase traffic at peak times. ATE therefore recommends the provision of LTN 1/20-compliant segregated cycleways.

School

The current layout appears to prioritise vehicle access, with circulation and parking dominating the primary frontage. This reduces the opportunity to create a strong relationship between the school and its neighbourhood.

The National Model Design Code emphasises that schools should be integrated into their surroundings, respecting building lines and block patterns. The design would benefit from moving buildings closer to the street, creating a more pedestrian-friendly frontage with improved surface treatments rather than focusing on parking and access roads.

Examples of good practice include:

- Northstowe Secondary College, Cambridgeshire: Parking is located to the rear, creating a large, shared civic frontage.
- St Gabriel's CofE Academy, Warwickshire: The design integrates the school frontage with the public realm and minimises interaction between pedestrians and parked vehicles.

Materials

The Design and Access Statement notes: *“Materials such as self-binding aggregate will be used, providing a durable yet natural appearance, while traditional chestnut cleft fencing will be introduced to reflect the local character.”* Where routes are intended for utility purposes (i.e., access to local amenities and not only leisure), sealed surfaces should be provided to ensure they are usable throughout the year.

6. Cycle Parking

The applicant refers to the West Sussex Guidance on Parking at New Developments. Detailed proposals for cycle parking must be submitted in line with LTN 1/20 and the most robust local standards. This applies both to residential dwellings and to staff facilities at the proposed school.

Future submissions should ensure:

- Provision complies with both local policy and LTN 1/20, adopting whichever standard is most rigorous
- Storage is secure, accessible, and at least as convenient as car parking
- Residential cycle storage is ideally located at the front of dwellings and installed by the developer

3.0 Next Steps

It is requested that these recommendations are provided to the LPA case officer and forwarded to the agent and applicant. ATE would be content to review further submitted information to help address the above identified deficiencies, with a view to providing a further response and recommended wording for planning conditions and obligations.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

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Our priorities...



From: Active Travel England Planning [REDACTED]

Sent: 31 July 2025 10:18

To: Planning Responses <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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