



Active
Travel
England

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Your Ref: 3/23/1447/OUT
Our Ref: ATE/23/00368/OUT
Date: 07 November 2023

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

From: Planning & Development Division, Active Travel England

To: Amit Patel, East Hertfordshire District Council

Application Ref: 3/23/1447/OUT

Site Address: Land East Of The A10, Buntingford

Description of development: Outline planning for the development of 350 dwellings, with up to 4,400 sqm of commercial and services floorspace (Use Class E and B8) and up to 500 sqm of retail floorspace (Use Classes E) and other associated works including drainage, access into the site from the A10 and Luynes Rise (but not access within the site), allotments, public open space and landscaping.

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

These comments are provided by Active Travel England (ATE) in response to the Technical Note 1 (TN1) 'Response to Active Travel England Comments' dated 15/09/2023. In preparing this response ATE has reviewed the submitted plans and documents and liaised with highway authority.

Although some items have been addressed there are still outstanding items which are listed below.

2.0 Areas of Concern

The applicant makes a key pledge early on in the submitted Design and Access Statement to create *"a new liveable mixed use neighbourhood with most of people's daily needs met within a short walk or cycle."* While a laudable and valid commitment, it is ATE's principal concern that this will not be achieved or secured by the submission in view of the submissions to date.

A significant amount of detail is outstanding with regard to the access to the site and its specification which is not a reserved matter. As an outline application, these proposals will set key principles and resultant travel patterns and trends for which there will be extremely limited scope to revisit or revise at the reserved matters stage or thereafter, where the focus is solely on the internal layout bound by the red line of each subsequent application. The outline application stage therefore represents the greatest opportunity to influence the long-term accessibility of the development holistically, and through exploiting the opportunity for a permeable and connected new settlement and in so doing avoiding missed opportunities to maximise connectivity. This will improve the future chances of embedding and sustaining active travel throughout the lifetime of the development.

Please note the paragraph and table references on page 2 of the TN1 are not correct making it difficult to follow.

Connection via Luynes Rise and Aspenden Road

This is the primary connection to the site for walking, wheeling and cycling and provides a link to the improved cycle network on Station Road and on to the High Street. A design for this access is required, and clarity is sought as to whether it is intended as a bus link as well as an active travel link.

The response states that the traffic flows on Luynes Rise and Aspenden Road are less than 2500 vehicles per day, the survey data relating to traffic flows and speeds could not be located in the TA, however given that speed limit is 30mph on these roads, Figure 4.1 of LTN1/20 indicates that provision will not be suitable for all people and that light segregation is recommended. As these are residential roads lowering the speed limit to 20mph, with effective traffic calming, is an option that should be discussed with the highway authority. There are also stretches of the route that do not have footways or the footways are less than 2m in width.

The two strands of S106 are noted, however ATE would want to see improvements on this route between the site access and Station Road provided by the developer as S278 works, this will ensure that that works are delivered in accordance with the time scale of the construction and occupation of the site. Outline plans for a scheme should be provided at this stage to ensure deliverability, the scheme should be developed in consultation with the highway authority and safety audits provided as necessary.

Qualitative Review of External Active Travel Routes

The use of the Level of Service Tool and Walking Route Audit Tool and provisions of plans with photographs on are welcome. It is noted that the scores for the route are generally low. In some cases this is because of physical constraints that cannot be changed (alleyways between houses) but there are other issues that can be addressed such as surfacing, lighting, dropped kerbs, signing and crossings. The next step is to use the audit to develop a suite of measures to improve the routes and help embed cycling not only with the development but connections from the site. Schemes should be developed for key routes with the intention of them being delivered through the S278 mechanism by the developer.

Permeability and Access to the Site

The applicant should demonstrate what exactly what treatment is to be provided at the access points with the public right of ways and at Peasmead where it is noted there is limited land available. ATE would like to understand what work has been undertaken to try and acquire land to provide more than one walking and cycling access that faces towards the village. This is especially important to the north of the site where direct connections to schools and the village centre are important and to the south to provide direct connections to the employment centre.

Comments on Development Framework Plan (DR-A-1002)

It is essential that fundamental principles are agreed at this stage in order to ensure that the correct details are secured at outline planning, which ensures their subsequent inclusion as an integral part of the reserved matters application(s). In the absence of the correct specification of infrastructure being secured, there is no guarantee that these components will be included, nor is there any certainty that future applications will be submitted as one and by the current applicant.

a) Ensuring that there are good walking and cycling routes within the development is required to achieve high modal share. The off-road cycle route should be continued to the north within the site to serve the development and then connect to the circular leisure route at an appropriate point. The off-road route on the spine road should continue into the employment area to provide safe cycle access for employees in a area which is likely to have a high number of HGVs.

i. The use of shared use on the spine road does not fall into the exceptional circumstances outlined in LTN1/20 6.5.6. In order to maximise pedestrian and cycle and avoid conflict between the users a segregated facility should be provided.

b) The orange leisure route should be designed for pedestrians and cyclists with an appropriate width. It should be noted that surfacing of leisure routes should be smooth, sealed and bound in accordance with Inclusive Mobility and LTN1/20.

These principles should be agreed at this stage to inform the future design of the site.

c) The point concerning the public rights of way across the site is noted and agreed as long as there are good cycling alternatives providing direct routes for walking, wheeling and cycling within the reserved matters layout.

Comments on Site Access Arrangements

d) ATE welcomes the use of the Junction Assessment Tool and the provision of a Sparrow Crossing on the A10 in the vicinity of the roundabout to connect to the wider PROW network. It is noted that the design is with Highways for discussion.

e) The intention for the spine road to be 20mph is welcome, it should be noted on the plans and it should be designed as such at this outline stage to ensure the speed limit is self-enforcing.

f) Again, it would be preferable to show junction treatments at this outline stage, and certainly the intention should be noted on the plans.

Cycle Parking

The standards to be applied cycle parking should be agreed at outline stage to ensure that the design going forward uses them from the beginning. Given the ambition of the

applicant to encourage active travel LTN1/20 standards for residential parking are recommended.

Bus Services

The diversion of bus services into the site is noted and welcome and should be secured through a S106 agreement.

Travel Plan

The comment concerning the national target of 50% of trips within towns and cities to be undertaken by walking, wheeling or cycling is understood and AT recognises that the target may not be achievable in a rural location such as this. However, it is not clear from the Residential Travel Plan what the final target is for active travel trips. A target is important not only to understand what needs to be done to achieve it and to help to limit the impact on congestion on the highway but to ensure access to active travel for residents making it easy for them to choose a healthy and cost-effective form of transport.

A number of initiatives have been put forward in the travel plan to be explored, these should be secured through the S106 and as should the remedial measures mentioned in the response.

3.0 Next Steps

This advice should be forwarded to the applicant and local highway authority. ATE would be content to meet with the LPA, HA and applicant and review further submitted information to help address the above identified issues; with a view to providing a further response and recommended wording for planning conditions and obligations.