



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 Luyne 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 have been prepared by Active Travel England in response to application 3/23/1447/OUT. The site does not appear to be allocated in the East Hertfordshire District Plan (2018). Policy TRA1 (Sustainable Transport) of the plan includes a requirement to 'Ensure that a range of sustainable transport options are available to occupants or users, which may involve the improvement of pedestrian links, cycle paths, passenger transport network (including bus and/or rail facilities) and community transport initiatives'; and 'Ensure that site layouts prioritise the provision of modes of transport other than the car (particularly walking, cycling and, where appropriate, passenger transport)

which, where feasible, should provide easy and direct access to key services and facilities’.

Hertfordshire County Council was successful in securing funding from the Active Travel Fund for a scheme in Buntingford, situated on London Road to east of the application site. The scheme provides:

1. A shared use path along London Road/Station Road/High Street
2. New and improved crossing points for pedestrians and cyclists
3. Introduction of a 30mph speed limit
4. New and improved bus stops

The final phase of the London Road works is completed and open, while a second stage of the scheme, High Street (Hare Street Road - Vicarage Road), is currently in detailed design with construction expected to start in Summer 2024.

It is understood that a Local Cycling and Walking Infrastructure Plan (LCWIP) for East Herts is currently under development, but no details are currently available.

2.0 Summary

Active Travel England (ATE) considers that the application as submitted does not demonstrate that ‘appropriate opportunities to promote sustainable transport modes can be - or have been - taken up’ in accordance with the National Planning Policy Framework (NPPF), paragraph 110a. It is therefore recommended that this application should not be determined until further information has been submitted and reviewed.

As far as can be determined from the submitted documents the application does not provide sufficient information for ATE to be assured that the design of the development, proposed active travel infrastructure and travel plan will create an environment that supports and embeds active travel.

3.0 National Policy and Guidance

The National Planning Policy Framework (NPPF) states:

110. In assessing... specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; [and]
- b) safe and suitable access to the site can be achieved for all users;

112. ...applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas...;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; [and]
- c) create places that... minimise the scope for conflicts between pedestrians, cyclists and vehicles...;

Gear change: a bold vision for cycling and walking is the Government’s cycling and walking plan for England. This sets the Government’s vision for cycling and walking to be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030. Active Travel England’s responsibilities for walking also extend

to “wheeling”, such as the use of wheelchairs (self-propelled or powered) and mobility scooters.

Inclusive mobility: making transport accessible for passengers and pedestrians provides guidance on designing and improving the accessibility and inclusivity of public transport and pedestrian infrastructure.

Active Design (Sport England, supported by Active Travel England and the Office for Health Improvement & Disparities) sets out how the design of our environments can help people to lead more physically active and healthy lives.

Local Transport Note 1/20 (LTN 1/20) provides guidance to local authorities on delivering high quality, cycle infrastructure. It includes five core design principles which represent the ‘essential requirements to achieve more people travelling by cycle or on foot, based on best practice both internationally and across the UK’ and detailed design standards to cycle infrastructure.

4.0 Areas of Concern

It is not clear from the application what mitigation and improvements to the active travel network are proposed. While there are references to improvements of public rights of way, bus services and mobility hubs in the transport assessment it not clear what will actually be provided and what the likely impact of the proposals will be. Proposals to improve infrastructure between the site and High Street/Station Road do not appear to have been identified.

Active travel infrastructure and schemes need to be agreed and secured at outline stage to ensure that that the site is connected to the village and facilities in it and to build upon the work that is being carried out in Buntingford to improve active travel infrastructure. The consequence of not doing this is likely to mean routes are unattractive to many users, contributing to car-reliance and the resultant negative impacts upon the local environment and physical and mental health.

Trip generation

Quantification of active travel movements generated by the development is limited in both the transport assessment and travel plan and therefore the analysis presented provides very little evidence upon which to build an effective strategy for a healthy and inclusive development. Although the transport assessment emphasises that this development will prioritise walking and cycling the trip generation in section 5 does not reflect this ambition. The transport assessment should contribute to the government's vision for half of all journeys in towns and cities being walked, wheeled or cycled by 2030 and reflect the targets in the travel plan, rather than simply provide forecasts based on historic peak hour data.

The number of all day active travel trips should be forecast based on the vision for the site. This information combined with traffic flows is required ensure that appropriate active travel infrastructure to key facilities is provided and then its use embedded from an early stage through travel plan measures.

Qualitative review of external active travel routes

The location of the site means that it is more than 800m from most key facilities and 7km from the nearest rail station, making the shift to active travel modes more challenging. It is not clear how the isochrone accessibility maps in the transport assessment have been

developed as, for example, the Co-op on Station Road appears to be more than 800m from the centre of the site and from all the proposed residential areas of the site but is shown as being within in the 800m isochrone. The cycling isochrone map appears to use footpaths or narrow alleyways where cycling is prohibited or that are unsuitable for shared use. These should be checked and information provided on the assumptions underlying the maps (note that the maps in the appendices have been incorrectly produced as the layers do not coincide with the base map).

While the maps provide information on the distances to key facilities they do not provide information on the quality of the routes and therefore whether they are of the required standard to incentivise walking, wheeling and cycling trips. Key to this site include the routes to the facilities on High Street/Station Road, routes to education facilities (primary school, middle school and college) and places of work, and to the village of Aspenden.

Routes to key facilities must be carefully considered to ensure that they are designed in accordance with the standards in LTN 1/20 and can accommodate future walking, wheeling and cycling trips. A more detailed analysis of them is required in order to provide an understanding of the design and deliverability of schemes which are required to embed active travel and ensure that the modal share targets are met. The Level of Service Tool and Junction Assessment Tool in LTN 1/20, and the Walking Route Audit Tool, should be used to assess key routes and develop appropriate schemes compliant with current standards.

Permeability and access to the site

The transport strategy for this site relies on the provision of walking, wheeling, cycling and possible bus access from Lunes Rise. Two other pedestrian accesses are proposed using public footpaths 28 and 29. The all-modes access, and only vehicular access, is proposed as a roundabout on to the A10, which is likely to be of limited benefit for active travel.

The accesses that use the public footpaths are unlikely to be attractive to residents at all times as it appears that the sections through the existing development are narrow, constrained by fencing in places, not overlooked and possibly not lit. The detailed assessment outlined above will identify current conditions and whether improvements can be made.

There appears to be an opportunity to secure an active travel access onto Peasmead. This would be of benefit to the site, as would any opportunities to link the employment areas to the Watermill Industrial Estate for walking, wheeling and cycling. These options should be investigated.

Evidence that the proposed active travel accesses can be provided should be attained at the outline application stage. These, and additional active travel accesses where possible, must be secured by a Grampian condition to ensure that they are delivered before first occupation and not thwarted by any land ownership issues that arise at a later stage. The application will not be acceptable to ATE if the only access is onto the A10.

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

a) The proposed internal footway/cycleway should extend to the employment area to the east and to the residential area to the north so that this serves and connects all of the site. The use of the shared surface should be reviewed against the requirements in LTN 1/20.

b) It is not clear what the distinction is between the the footway/cycleway (purple) and the recreational route (orange). Both seem to serve the residential area and should be of the same standard.

c) The treatment of the public rights of way and whether they will be upgraded for cycling is not clear.

Comments on Site Access Arrangement (7498-GA-02-REV G)

d) The junction design should be assessed using the Junction Assessment Tool in LTN 1/20.

e) The need for a 30mph access road into the site should be reviewed as residential streets should be designed to keep vehicle speeds at or below 20mph in accordance with Manual for Streets (Section 1.6.1).

f) Appropriate junction treatment should be considered at the site access.

g) The proposed crossings of the do not appear to be LTN 1/20 compliant for the speed and traffic volume of the road. The public rights of way are likely to attract more use so the provision of a crossing in accordance with national standards is required.

Cycle Parking

The transport assessment proposes to use the minimum standard for car parking from the East Herts SPD Parking Provision at New Developments (2015) as the site is being designed to maximise active travel.

To support this ambition it is recommended that the cycle parking standards in LTN 1/20 Table 11-1 be adopted for all dwellings i.e. 1 per bedroom and that this be conditioned at outline stage. At reserved matters stage, more innovative ways of providing cycle parking should be considered than a shed in the back garden in order to provide convenient and secure cycle parking.

It should be noted that LTN 1/20 states that, as with car parking, a proportion of the commercial cycle parking (typically 5%) should be provided for non-standard cycles to accommodate people with mobility impairments. This should be subject to condition or identified for assessment at reserved matters stage as appropriate.

Bus Services

The nearest bus stop is over 400m from the site. The transport assessment states that the applicant is seeking to establish a pick up point for the DRT in the development, or divert services through the site, and that contributions are planned. It is not clear what these contributions are or how they will improve bus services to the site. Further details and commitments are required to ensure that appropriate services to the site are provided. Discussion with the local highway and planning authorities should continue in this regard, with an agreed position forming part of the S106 agreement for the site.

Travel Plan

The submitted travel plan requires further detail on the level of active travel trips that are forecast to be generated. Initial targets for mode share should be more ambitious to reflect the overall objectives for the site. Details of the infrastructure to be provided and how its use will be embedded by initiatives and incentives in the travel plan should be outlined and committed to. Details of actions to be taken if the targets are not met should also be outlined with the intention for these to be secured, implemented and monitored through planning conditions / S106 obligations. The final travel plan should be submitted for approval prior to first occupation of the development.

Continued

5.0 Next Steps

This advice should be forwarded to the agent/developer and highway authority. ATE would be content to review further submitted information to help address the identified issues; and with a view to providing a further response and recommended wording for planning conditions and obligations as appropriate.

If this application is to be presented to the Council's Planning Committee, ATE would like to be notified in advance of the meeting date and the publication of any agenda and report.