



Active
Travel
England

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

Your Ref: 3/24/0966/OUT
Our Ref: ATE/24/00650/OUT
Date: 19 June 2024

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

From: Planning & Development Division, Active Travel England

To: East Hertfordshire District Council

Application Ref: 3/24/0966/OUT

Site Address: Land North Of A507, West Of A10, Buntingford

Description of development: Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access.

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 3/24/0966/OUT. The site does not appear to be the 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:

- A shared use path along London Road/Station Road/High Street and improved crossing points for pedestrians and cyclists
- Introduction of a 30mph speed limit
- 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.

A Local Cycling and Walking Infrastructure Plan (LCWIP) for East Herts is currently under development, with the Network currently being developed and public engagement planned for this year.

2.0 Summary

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 116 and 114a. 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 Active Travel England (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 in line with the national target for 50% of all journeys in towns and cities to be made by walking, wheeling and cycling.

3.0 Areas of Concern

Trip generation and assignment: Area of concern, more information required

Quantification of **all day** active travel movements generated by the development is missing from both the transport assessment and travel plan and therefore the analysis presented does not provide all the evidence required upon which to build an effective strategy for a healthy and inclusive development.

A number of assumptions have been made about internalisation of trips and modal shifts to active travel but it does not forecast what this will mean in terms of the number of all-day active travel trips and their distribution and thus whether the current or proposed active travel will support these. This information combined with traffic flows and speeds is required to design the appropriate active travel infrastructure to key facilities within and outside the application site. ATE therefore expects the applicant to present a multi-modal

trip generation analysis of all modes of transport throughout the day, rather than the analysis being confined to peak hour periods.

Policy/Guidance References:

Planning Policy Guidance on Travel Plans, Transport Assessments and Statements – a qualitative and quantitative description of the travel characteristics of the proposed development.

Active travel route audit: Area of concern, more information required

The location of the site means that it is more than 800m from most key facilities, but it is not clear from the maps the routes that are being used. Where routes are being used that are not accessible to all users, at all times of day and all year round the distance for the routes residents would have to use should also be shown on Table 4.1. The distances and times for cycling should be adjusted as they are different to the routes pedestrians can take using the pedestrian bridges. While new facilities are planned to come forward with the development the timing of this is not clear.

The improvements to the A507/B1038 Baldock Road are welcome and comments are made below. However, while the accessibility maps in the transport assessment provide information on the distances to key facilities but they do not provide information on the quality of the routes and therefore whether they are of sufficient quality to encourage walking, wheeling and cycling. Key to this site are the middle school and College, the leisure facilities, local food shop, the high street and facilities there. Where public rights of way and bridges are being used to access facilities the condition of those, whether they are compliant to the guidance in LTN1/20 and Inclusive Mobility and any barriers should be identified and it made clear if they are suitable for all users at all times of day and throughout the year.

Routes to future key facilities must be carefully considered to ensure that they are designed in accordance with the standards in LTN1/20 and can accommodate future walking 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 Assessment Tool, should be used to assess key routes and develop appropriate schemes compliant with current standards. The assessment report should include maps, photos, comments and proposals for schemes where required. Where rights of way are proposed to be used consideration should be given to whether they can be upgraded to allow the use of cyclists, the surfacing and lighting.

Policy / Guidance Reference:

- NPPF 108c: identifying and pursuing opportunities to promote cycling
- NPPF 114a: opportunities to promote sustainable modes have been taken up
- Inclusive mobility: making transport accessible for passengers and pedestrians, removal of barriers and design of bridges.

Pedestrian access to local amenities: Area of concern, more information required

As discussed above further information is required to fully assess the routes however it is noted that the A10 and A507 form barriers to key facilities. Public rights of way are cited as key routes, making distances much shorter than if the roads are used, however while these may be suitable for the occasional leisure walker, in their current state, they are not suitable to serve a development of 600 dwellings with amenities such as a school, doctor's, older people facility and community centre which are likely to attract people from the neighbouring areas.

It is not clear from the application if the existing footbridge complies to standards in Inclusive Mobility in terms of being accessible for wheelchair users, the photograph in the DAS shows that it is unlit and unattractive and therefore residents may be more inclined to use the car rather than the bridge.

The route assessments (outlined above) should be used to inform a scheme of works to upgrade the routes that are going to be relied on to access local facilities. This is particularly important for routes to the schools.

If these direct routes are not improved then the proposed 15% modal share relied on in the trip generation may not be achievable as people will be tempted to use their cars.

Policy / Guidance References:

- NPPF 108c: identifying and pursuing opportunities to promote cycling
- NPPF 114a: opportunities to promote sustainable modes have been taken up
- NPPF 116a: giving priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;
- Inclusive mobility: making transport accessible for passengers and pedestrians, removal of barriers and design of bridges.

Cycling accessibility: Area of concern, more information required

As discussed above the assessment will provide information on the suitability of routes. The guidance in LTN1/20 should be used to inform any improvements needed, paying particular attention to the connectivity of routes, types of crossings and separation from the carriageway required.

The use of the existing bridge, public rights of way, the speed limits on the surrounding roads and roads to the schools and town centre are of concern. It appears that there is in effect going to be only one safe and suitable cycling access from the site to serve a development of 600 dwellings and other facilities.

Policy / Guidance References:

- NPPF 108c: identifying and pursuing opportunities to promote cycling
- NPPF 114a: opportunities to promote sustainable modes have been taken up
- NPPF 116a: giving priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;
- LTN1/20: Detailed guidance on cycle infrastructure.

Access to public transport: Area of concern, more information required/ Condition or obligation to make acceptable

The nearest bus stops are 1.3km from the centre of the site and 1.5km from the north of the site, which is considerably more than the recommended 400m and is unlikely to encourage use of public transport. The start and finish times of the bus services have not been provided in table 4.2 giving an incomplete picture of the current provision.

It is noted that the transport assessment states that talks with Arriva concerning a bus service entering the site are ongoing, further details of these are required and a minimum service level should be secured through condition or obligation.

It is noted that the proposal for the bus route is to go into the site and turn at the community centre and come back again. It is not clear from this that all dwellings will be within 400m of a bus stop. It is also not best practice for buses to go in and out of a site in this manner. The reserved matters application should be designed so that the bus can loop through the site ensuring that all dwellings are within 400m of a bus stop. (See Bus Services in Urban Developments CIHT (2018) page 13). The use of bus gates can be used to ensure the bus has advantage over the private car.

It is recommended that a Movement and Transport Plan in the DAS is updated to show a more suitable indicative arrangement and that a design code is produced that includes the design criteria for bus stops.

Policy / Guidance References:

NPPF 108c: identifying and pursuing opportunities to promote public transport

NPPF 116a: facilitating access to high quality public transport

Inclusive Mobility: 9.1 – The siting of bus stops

LTN1/24 Bus User Priority

Off-site transport infrastructure and access arrangements: Area of concern

General Comments on submitted drawing of schemes:

The plans should include the following:

- Dimensions, including widths of crossings, footways/cycleways
- Visibility splays for accesses and crossings (speed surveys should be provided if the splays cannot be provided for current speed limits). The crossings of the A507 appear to be on an incline so the visibility splays should be shown in both the vertical and horizontal plans.
- Radii of accesses and radii of cycle routes
- Highway boundary
- Junctions should be assessed with the Junction Assessment Tool in LTN1/20
- Crossings types should be checked against LTN1/20 table 10-2.
- The schemes should be subjected to the Stage 1 Road Safety Audit with a designer's response submitted.

Detailed comments on submitted drawings:

Proposed Site Access: Drawing number 0009 Rev P4. (the comments start in the west)

- a. While the proposal for a lower speed limit is welcome ATE recognises that it as a separate process and may not be achieved. In addition it is reasonable to anticipate that drivers may exceed 30mph on this section of carriageway despite the proposed village sign and road markings because of the nature of the road and the fact that appears there is no frontage planned so it will not have a village feel. Speed limits should be self-evident and self-enforcing in accordance with DfT guidance on the

setting of local speed limits (DfT Circular 01/2013). Lowering speed limits through signage and gateways alone achieve limited impact, particularly where frontage property development is set back from the highway and masked by hedge lines and trees.

- b. A blue footway is shown coming from the site to the west of the roundabout. It is not clear exactly what this will access, the master plan indicates it will enter open space. ATE recommends that this is provided as footway /cycleway and connected to the access to allow cyclists as well as pedestrians to use it.
- c. The segregated footway cycleway is shown on the west of the access road. As the desire line is to the east it would make more sense to provide it on the east of the road so that fewer users have to cross the road at the access. Consideration should be given to providing pedestrian and cycle facilities on both sides of the spine road up to, and in the vicinity of the village centre and first school as this will have to accommodate the most pedestrian and cycle trips.
- d. The residential scheme should provide for cyclists entering and leaving the carriageway to the west of the access.
- e. The access roundabout to the southern commercial and norther residential areas requires signalised crossings due the traffic flows on the A507.
- f. The verge between the carriageway and footway/cycleway should be reviewed to ensure they are in accordance with LTN1/20 table 6-1).
- g. Clarification is required as to whether an uncontrolled crossing is being proposed to the north-west of the 3rd party access, the purpose of this is not clear. If this is to be a crossing of the A507 it should be reviewed against LTN 1/20 - table 10.2.
- h. On the eastern side of the crossing of the 3rd party access the arrangement should be reviewed to give priority to pedestrians rather than cyclist turning into the access.
- i. The signalised crossing over the A10 should be reviewed. It is appears there is land on the eastern side to continue the segregation for a short distance meaning that the conflicts that can occur on a shared surface will be reduced at the crossing. A straight over crossing rather than a staggered crossing should be considered as this would provide a better facility for pedestrians and cyclists.

Bridge Crossing over A10 Drawing no. 002 P6

- j. The drawing of the bridge does not provide enough detail, details of parapet heights, gradients and widths should be provided along with plans showing proposed side elevations and details of lighting. Dimensions drawings of side elevations, and cross-sections should be proposed so the principles can be established.
- k. The bridge does not appear to be compliant with Inclusive Mobility in that, as far as can be determined from the submitted plans, no ramps have been proposed to allow wheelchair access across the bridge.
- l. There are no details identifying how the public rights of way are to be treated, details of widths, surfacing and lighting should be provided.
- m. The bridge should be designed to accommodate cyclists, the applicant should investigate through discussions with the highway authority and landowners whether the public rights of way can be upgraded to allow cyclists to use them and connect to the facilities to the east of the A10.

Proposed site Access Arrangements (Southern Section) Drawing Number 0001 P13

Please note comments above on Drawing number 0009 Rev P4, including comments on proposed types of crossings proposed and the need to consult table 10-2 in LTN1/20

Active Travel Connection to Buntingford Drawing Number 003 P1

The drawing should be provided on a plan that shows more detail so that any obstacles to deliverability are understood at an early stage.

The key is in black and white so does not help with understanding the drawing.

The comments start in the west of the top drawing and end in the east of the bottom drawing.

- n. See comments above on crossing of the A10.
- o. The crossing shown to the west of Greenways is not a prescribed crossing, table 10-2 of LTN1/20 should be consulted.
- p. Consideration should be given to side road treatments for pedestrians as well as cyclists along the route for example at Greenways.
- q. There is a bus stop and shelter to the west of Monks Walk that will have to be accommodated or moved. The tree in this location is low hanging and may be dangerous for cyclists.
- r. It is not clear what the side road treatment is to be for The Folly.
- s. Rather than finish 100m from the High Street other options should be considered such as introduction of a 20mph speed limit, and transitioning cyclists onto the carriageway with supporting signing and infrastructure.

Policy / Guidance References:

- NPPF: 96c: enabling and supporting healthy lifestyles
- NPPF 108c: identifying / pursuing opportunities to promote walking, cycling and public transport
- NPPF 114b: achieving safe and suitable access for all users,
- NPPF 116a: giving priority first to pedestrian and cycle movements;
- LTN1/20: Detailed guidance on cycle infrastructure.
- Inclusive Mobility – pedestrian bridge design

Site permeability: Area of concern

The permeability, for wheeling and cycling in particular, is limited. Further information is required concerning the quality of the pedestrian links to the east (as outlined above).

ATE recommend that at any proposed links are secured through condition.

Policy / Guidance References:

- NPPF: 96a: promoting social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through... street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods
- NPPF 116a: giving priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;

Place making: **Condition or obligation to make acceptable** .

ATE recommends that the requirement for a sitewide design code for active travel infrastructure is secured through condition be submitted and approved prior to reserved matters submission. That design code should show how the development will comply with the guidance in LTN 1/20 on Cycle Infrastructure Design, in Manual for Streets and the National Model Design Code include (but not be limited to):

- 1) The phasing of the development including the phasing of infrastructure.
- 2) The principles of the street and public spaces hierarchy to address, permeability, walking, wheeling and cycling movement and the needs of people with disabilities
- 3) The design of the transport network street hierarchy, primary, secondary, local, tertiary, and multi-functional streets, cycleways/cycle paths, footways/footpaths and public spaces, providing typical street cross-sections, which should include details of junction types, sideroad treatments, traffic calming, surfacing, segregation, lighting, tree planting, passive surveillance and on street parking, including construction design details.
- 4) The design of the spine road, including features to reduce severance of the development, segregated facilities for pedestrians and cycles, appropriate controlled crossings and side road treatments and the design detail outlined in 3
- 5) Details of the approach to cycle parking for residential, including the distribution (resident/visitor parking and location in the development), type of rack, spacing and any secure or non-secure structures associated with the storage of cycles.
- 6) Details of the facilities and design of primary and secondary mobility hubs
- 7) A wayfinding strategy for active travel

Policy / Guidance References:

National Model Design Code, Part 1: 59 Movement – i) Connected Places, ii) Active Travel
NPPF 138 Use of local design codes as early as possible in the evolution of schemes.

Cycle parking and trip-end facilities: Condition or obligation to make acceptable /

It is recommended that a Design Code which includes the standards and design for cycle parking for dwellings and non-commercial development and play areas. The design should follow best practice and should be noted that LTN1/20 states that as with car parking, a proportion of the cycle parking (typically 5%) should be provided for non-standard cycles to accommodate people with mobility impairments.

Policy / Guidance References:

- NPPF 110 provide supporting infrastructure such as cycle parking.
- LTN 1/20 Guidance
- Active Design Principles 7 and 8.

Travel planning: Area of concern

ATE recommends that separate travel plans are provided for the residential area, the commercial area and school, as they have different needs and will be delivered in different ways.

Please note the comments above concerning distances on table 5:1 and bus services on table 5.2.

The forecast trip rates include on a 15% modal shift away from single occupancy car use. It is not clear whether the figures in table 7.1 include this 15 modal shift. The active travel modal share is shown as 11%. The target should reflect and contribute to the national target for active travel set out in Gear Change, for half of short journeys in towns and cities to be walked, wheeled or cycled by 2030. While this is a rural area and therefore over 50% is an ambitious target, given the proposed infrastructure a higher modal share should be achievable and the targets should be more stretching and the time period for achieving them should be stated.

It is not clear from the travel plan what actual incentives are being provided, for example is a car club going to be supported on the site, will residents be given incentives to join it such as free membership and a number of free miles use, will parking spaces be provided for it? What value are the residential Travel Vouchers going to be provided for – the minimum quoted in table 9.1? Evidence should be provided to show that this is enough to incentivise active and sustainable travel and the use of the infrastructure being provided. It is not clear that cycle training will actually be provided, or that led rides and walk will be provided. As health facility is proposed for the site references to social prescribing could be made.

Tabel 11.1 the Action Plan does not include any of the 'possible' initiatives mentioned in the other parts of the travel plan. While it is recognised that the travel plan will evolve there must be key deliverables that that are identified and committed to within the plan and these should be secured through the S106.

Details of possible remedial measures to be taken if the targets are not met should be outlined and committed to with the intention for these to be secured, implemented, and monitored through the planning conditions / S106 obligations. The final travel plan should be submitted for approval prior to first occupation of the development.

Policy / Guidance References:

- NPPF: 117 – Travel Plans
- National Planning Policy Guidance: Travel Plans, Transport Assessments and Statements

4.0 Next Steps

These recommendations should be forwarded to the applicant and highway authority. ATE would be content review further submitted information to help address the identified issues; with a view to providing a further response and recommended wording for planning conditions and obligations.