

RESPONSE ON BEHALF OF RICHBOROUGH TO ACTIVE TRAVEL ENGLAND'S COMMENTS

HBBC planning application reference: 24/00264/OUT

- 1.1 This response has been prepared by Boyer on behalf of the applicant, Richborough, in regard to Active Travel England's (ATE) consultation response received by Hinckley and Bosworth Borough Council on 15th May 2025.
- 1.2 The proposals seek outline planning consent for the erection of up to 415 dwellings, including landscaping, open spaces, drainage, and associated infrastructure (access only).
- 1.3 It is noted that ATE made a previous consultation response on 22nd April 2024.
- 1.4 It is welcomed that ATE acknowledge that a number of the details sought could be dealt with via condition, which subject to the wording of, the applicant is not disagreeable to. However, the applicant disagrees that the level of detail sought should be provided at this outline stage, rather than as part of the subsequent reserved matters. At this stage the principle of development and access to the site are the only matters for determination by the local planning authority.
- 1.5 ATE's comments and the applicant's response are provided below to assist the local planning authority in reaching a positive view that the scheme from a principle of development and access perspective, at this outline stage, are capable of being able to be positively determined from a transport sustainability perspective:

3.0 Active Travel Toolkit Assessment

3.1 Trip generation and assignment: *Further Information Required*

ATE notes that the trip rates for the proposed development have been derived from the phase 1 planning application. These current forecasts (TA, Table 5.1, p.13) are based upon vehicular modes and provide very little basis / or evidence upon which to build an effective strategy for a development that successfully connects to its surroundings.

ATE advises that the applicant presents a comprehensive, multi-modal trip generation analysis of all modes of transport throughout the day, rather than the analysis being confined to commuter-led peak hour periods. This approach does not provide the opportunity for the development to demonstrate how it can meet the government's objective for half of all journeys in towns and cities to be made by walking, wheeling, and cycling (Gear Change, 2020).

- 1.6 Hub Transport Planning have prepared an Addendum to the Transport Assessment (11/04/25). This sets out that following consultation with Leicestershire County Council (LCC), Warwickshire County Council (WCC) and National Highways (NH), the Pan Regional Transport Model (PRTM) was commissioned to assess the impact of the development on the local highway network. The vehicular trip generation has been agreed between all relevant parties. Whilst ATE are requesting full multi-modal trip generation analysis across the entire

day, the transport assessment work requires peak period trip generation analysis, and it is also clear from the proposals that the development will provide appropriate opportunities for walking and cycling. A full person trip rate assessment can be included within the updated Travel Plan in due course.

3.2 Active travel route audit: Further Information Required

The application does incorporate qualitative analysis of the pedestrian and cycling routes as identified in the Chapter 4 'Sustainable Travel' of the submitted TA and reiterated in Chapter 3 of the TP. ATE notes that the quality of the trips to crucial facilities such as schools are detailed by the applicant, and a map is provided to show the site's proximity to local facilities.

However, it is crucial that at this stage of the planning process that a more rigorous approach to assessing routes is undertaken to ensure that the subsequent design interventions for the access route are of the highest quality for residents/users of both this and for subsequent phases of development. For example, as the applicant has identified in the submitted DAS (p.23), there are no Public Rights of Way (ProW) that cross the site but there are:

various routes present throughout Hinckley which can be used by residents as traffic-free walking routes

· a segregated foot/cycle way on the Southern side of the A47.

It is vital that the applicant provides a detailed analysis of these routes, and the identification of improvements to make them attractive to users of all abilities, incorporating proposed infrastructure such as the toucan crossings to be provided along with the A47 to the West of the site (TP, p.8).

- 1.6 The application, as identified by ATE, incorporates qualitative analysis of the pedestrian and cycle routes available locally to the site, such as routes to schools etc.
- 1.7 Proposed pedestrian and cycle crossings are to be provided as part of the development proposals to link to the existing shared pedestrian and cycle route to the south of the A47.
- 1.8 Local supermarkets and wider services and facilities at the northern end of the town and within the town centre are all easily accessible by dedicated cycle routes or traffic calmed streets. It is considered the applicant has identified opportunities to promote walking, cycle and public transport use as per the requirements of para 109 of the NPPF.
- 1.9 However, a more detailed LTN 1/20 assessment can be incorporated within the updated Travel Plan in due course.

3.3 Pedestrian access to local amenities: Further Information Required

Most of the site is located greater than 800m (i.e. a comfortable walking distance) from the wide range of local amenities which is recognised by the applicant in Table 3 'Distance to Local Services' (TP, p.8). It is noted that only 3 services are within what is considered to be a comfortable walking distance for most active travel users and that one of these is a McDonald's fast-food restaurant (700m away). This reiterates how it is imperative that the applicant needs to identify the key routes to local services, following a more detailed analysis as suggested in 4.2.

- 1.10 See our response at 1.7 above. Such an analysis has been undertaken and has identified what opportunities are available for active travel locally to services close to the site.
- 1.11 It is worth noting that c.80% of all trips under 1 mile/1.6km are undertaken wholly by foot; there are a number of facilities within 1.6km of the development site.

3.4 Cycling accessibility: **Critical issue**

Both the primary road which traverses the site, and the main access point incorporate a shared foot/cycle way to facilitate Active Travel journeys. ATE's position is that this is inadequate to support large degrees of cycling journeys and also ensure that all users other active travel modes (e.g. walking and micromobility) can also enjoy safe journeys for recreation/utility. There is also the vital consideration that this application is part of a larger scheme and therefore must aspire to provide active travel infrastructure that can maximise the number of future active travel trips.

The applicant therefore needs to ensure that it adheres to all necessary aspects of LTN 1-20 – Chapter 6 'Space for Cycling within Highways'. ATE also strongly advises that the applicant provides details of appropriate active travel interventions for all streets of the

proposed development which may include measures such as shared use foot/cycle ways and where applicable, degrees of light segregation. This could build upon the clear conceptual street hierarchy as shown on page 73 of the DAS. Finally, ATE advises that if the applicant can significantly substantiate shared-use provision, then there must be a clear consideration of this type of provision as per 6.5 'Shared Use' of LTN 1-20 (p.67).

- 1.12 A shared footway and cycle way at the main access point to the site is considered reasonable and appropriate for this site, where it would link into existing shared foot and cycle ways on the edge of the town.
- 1.13 It is also worth noting that Table 6-3 of LTN 1/20 (below) shows that up to 300 pedestrians per hour and 300 cyclists per hour, can be accommodated within a 3.0m wide shared route (noting that the development site proposed 3.5m shared width):

Table 6-3: Recommended minimum widths for shared use routes carrying up to 300 pedestrians per hour

Cycle flows	Minimum width
Up to 300 cyclists per hour	3.0m
Over 300 cyclists per hour	4.5m

- 1.14 If the proposed development was to generate 300 pedestrians and 300 cyclists per hour, there would be no traffic generation at all to/from the site; the proposals will clearly be more than adequate for a high level of active travel use.
- 1.15 In respect of the internal layout and street hierarchy, this is a matter for consideration of the layout at the reserved matters stage and is not a matter for determination at this time as part

of an outline planning application. The layout as part of a future reserved matters scheme would need to comply with the Leicestershire Highway Design Guide which has been prepared with active travel in mind, and ATE will have the opportunity to comment on the detailed masterplan in due course.

3.5 Access to public transport: Further Information Required

The proposed development site is served by a bus stop along Ashby Road 750m from the centre of the site which incorporates the 148/158 services, which provide routes to key locations to Hinckley, Blaby, and Leicester with regularity (typically 3-4 services/hour). The journey as a pedestrian to these stops is safe but not particularly pleasant, with the bus stops themselves only providing a flagpole stop so not being substantial enough. The applicant has suggested that these can be improved through an appropriate mechanism with the Highways Authority (LCC) but has not confirmed specific details of these. It is noted that Hinckley Rail Station is 4km away and that this distance, while nominally a comfortable one for cycling only contains partial safe routes (shared use briefly on the A47).

Consequently, the applicant is advised to provide details of how the proposed site can improve the links and particularly the bus stops and also the quality of the facilities at these.

- 1.16 The applicant is reasonably prepared to consider any request made by LCC Highways for upgrades to the nearest bus stops to the site providing it can be demonstrated to meet the CIL tests (such a proposal is set out within the submitted Travel Plan already). In addition, within the heads of terms for the s106 agreement, provisions have been made covering public transport (bus passes) and a further updated Travel Plan being secured by condition.

3.6 Off-site transport infrastructure: Further Information Required

The applicant proposes to provide a pedestrian link at the site access which would then contribute to a circular pedestrian route for both this and additional phases of the overall development (ref: Drawing T23548.001 rev D).

However, the submitted TA only provides information regarding internal access provisions (page 11) and the main access. The applicant also is required to provide comprehensive details of the vital off-street transport infrastructure in addition to the proposed toucan crossings on the A47 as agree to by the phase 1 development.

It is particularly important that the applicant can demonstrate how safe active travel journeys between the site and the public transport provision and amenities as mentioned above (including the access with Hinckley & Bosworth Community Hospital).

As the applicant has referred to in the DAS (p.73) when quoting 'Building for a Healthy Life' (Homes England) there is the suggestion that the applicant wishes to *"Create well-connected street and path networks, providing opportunities for these to be extended beyond the site boundary in the future."* To realise this, ATE advises that this ambition is realised from the outset and will welcome the submission of additional details for review.

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.

- 1.17 It is considered that the applicant has provided all the necessary information to demonstrate through the TA Addendum what off-site transport infrastructure is required to be provided to mitigate the impact of the development. This has concluded that a contribution to upgrade the signals at the A47 / Ashby Road junction is required by way of suitable mitigation to address impacts arising from the proposals, and it should be noted that this includes improved pedestrian crossing facilities.
- 1.18 The submitted TA report also identifies the proposed Toucan crossing facility on the A47 that forms part of the adjacent Phase 1 proposals and to which this site will connect internally via traffic-free shared routes.
- 1.19 Furthermore, pedestrian access is available to Hinckley and Bosworth Community Hospital via the A47 and crossing the Ashby Road junction where a footway runs north to the hospital. However, it should be noted that the hospital has two adult inpatient wards which provide sub-acute care, complex rehabilitation and end of life care. It is highly unlikely that a significant number of trips would be made using active travel methods to this hospital which will require access by car for those with care needs. It is, however, accessible by active travel means from the development as set out above.

3.7 Site permeability: Further Information Required

Overall permeability is generally good – demonstration of a clear hierarchy indicated in the submitted Street Hierarchy Plan (DAS, p.73). The layout of the site has the potential to encourage active travel modes. However, there is insufficient detail to demonstrate that these can be maximised for *all* residents through the creation of additional access points e.g. at the edges of the development site.

Additionally, the key features e.g. the focal spaces, which help aid pleasant active journeys also require further detail. In addition, it is necessary for the applicant to provide detailed drawings/ cross -sections etc, for review which clearly demonstrate that:

- Pedestrians and cyclists are prioritised at all junctions (LTN 1-20 Figure 10.13) – while the applicant has indicated that these will be provided at RM stage (DAS, p.73) it is preferable for these to be provided for review at an earlier stage.
- Ensure safe transitions for cyclists as per 6.5.8 LTN 1-20.

- 1.20 It is noted that ATE consider permeability to be good. It is considered that the further detail being sought in relation to detailed junction designs etc is clearly a matter for consideration though the layout at the reserved matters stage and no further information is available to be provided at this stage.

3.8 Placemaking: Further Information Required

The proposed development indicates a general consideration of placemaking principles, particularly with the incorporation of green spaces and green corridors in locations that are highly visible, with good natural surveillance.

However, in terms of active travel, there are a lack of details which can substantiate how the development can maximise its' potential and henceforth contribute to more comprehensive active travel routes as mentioned above. These include traffic calming measures, location and type of wayfinding signage, surface materials and 'SUDS;' lighting for all attributes of the development and indicating the precise and suitable locations for cycle parking (as detailed below).

- 1.21 It is noted that ATE consider that the development incorporates green spaces and green corridors in areas of good natural surveillance. Traffic calming measures, signage and lighting are all matters of detail for condition or consideration at the reserved matters stage and no further information is available to be provided at this stage.

3.9 Cycle parking and trip-end facilities: Further Information Required

The applicant has indicated that cycle parking will be provided for each dwelling for the development, which will be sheltered and secure, and in the form of private garages or sheds or appropriate (para. 5.11, TA).

ATE advises the applicant that details need to be confirmed of the number of cycle parking spaces as indicated on Table 11.1 of LTN 1-20 (p.134) and including the design of these. It is also advised that additional forms of cycle parking are provided as it is good practice to provide dedicated cycle parking within new development as outlined in the NPPF in the same way as car parking is provided (para. 11.8.1, LTN -102, p.139).

- 1.22 ATE have noted that each dwelling will have private, secure cycle parking for residents and visitors alike. No further information is available to be provided at this stage and it is considered that this level of detail is for consideration through each plot design at the reserved matters stage.

3.10 Travel planning: Critical

The applicant has provided a general approach to the submitted TP which reiterates content from the TA.

In terms of active travel mode-share targets (TP, para. 4.8), the applicant as suggested an increase of walking (6.9% to 10.9%) and cycling (3.6 – 7.6%), with only a small increase of public transport (1.5 – 3.5%).

Crucially the mode-share targets in the TP demonstrate a lack of ambition and crucially don't align with national policy of 50% of all short urban trips to be walked, wheeled, cycled. (in complement with public transport use).

ATE notes how the applicant perceives their mode-share targets to be challenging (para 4.9) but emphasises that through implementing a more ambitious approach (including commitments to the necessary infrastructure as indicated in this response) can lead to the development being responsible for significant active travel mode-shares. In respect of monitoring and enforcement of mode share targets, the TP does provided details of what actions to be taken if the targets are not met (para. 6.13, TP) but the suggested measures are not considerate of active travel modes e.g. a site-specific car sharing database.

Consequently, ATE advises that an expanded and more ambitious Travel Plan should be outlined and committed to be secured, implemented, and monitored

through the planning conditions / S106 obligations. The travel plans should be supported and funded for the whole of the development period / set time / until the targets are met and sustained for a set period with the need for further infrastructure established and delivered where sustainable travel mode shares fail to be met.

- 1.23 Within the heads of terms for the draft s106 agreement there is the requirement for an updated Travel Plan to be provided as a planning obligation. It is considered that the Travel Plan submitted with the application demonstrates opportunities are available for all forms of active travel and whilst this may not achieve the 50% of short urban trips to be walked or cycled, this is not a requirement of either adopted local planning policy or set out as a requirement in the NPPF (Dec 24), which the application is required to be determined against.
- 1.24 As set out above, if the proposed infrastructure carries pedestrian and cycle trips to the level it is capable of doing, there would be very few (if any) vehicle trips to/from the proposed development site.
- 1.25 The site is located on the urban – rural fringe on the edge of the town. Para 110 of the NPPF makes clear that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making. It is considered that the location of the site on the edge of a rural area has not been considered by ATE when arriving at these conclusions.
- 1.26 Notwithstanding this, the TP measures include for bus stop improvements (to be agreed with LCC), bus passes/vouchers, electric vehicle charging, and on-plot cycle storage.

Conclusion

- 1.27 Overall, the applicant considers that the proposals fully accord with paras 109 and 110 of the NPPF (Dec 24) which is the required policy framework for the application to be considered against in the context of an out-of-date development plan. The NPPF is a significant material consideration and where the development plan is out of date and with the local planning authority unable to demonstrate a 5 YHLS, the tilted balance is engaged in the favour of the development proposals.
- 1.28 The applicant is content that it has provided the required level of information through the submitted TA, TA Addendum and Travel Plan to demonstrate that the development is acceptable in highway and transport terms and would provide for a well-designed and sustainable place. The development would afford the opportunity for residents to utilise sustainable active forms of travel in accordance with ATE's objectives, and ATE will have a further opportunity to comment on the detailed proposal as part of any subsequent RM application.
- 1.29 We request that the local planning authority consider ATE's comments alongside the comments provided in response as part of this rebuttal note within the overall planning balance.

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Director

Boyer

15th May 2025