



Active
Travel
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Your Ref: 24/00264/OUT
Our Ref: ATE/24/00434/OUT
Date: 23 April 2024

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

From: Planning & Development Division, Active Travel England

To: Hinckley and Bosworth Borough Council

Application Ref: 24/00264/OUT

Site Address: LAND NORTH OF, NORMANDY WAY, HINCKLEY, LE10 3DA

Description of development: Outline planning permission for the erection of up to 415 dwellings, including landscaping, open spaces, drainage, and associated infrastructure (outline - access only)

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 outline application (all matters reserved except access) for residential development on the Land North of Normandy Way, Hinckley, LE10 3DA.

The proposed development is for up to 415 no. residential dwellings and associated works including open space, within a site area of 16.10 hectares.

The proposed application would from Phase 2 for the outline planning consent at Land North of Normandy Way and East of Stoke Road, Hinckley (Application Reference: 22/00318/OUT) which was allowed at appeal in January 2024. The application site forms part of an identified strategic housing allocation in the Hinckley & Bosworth 2006-2036 Core Strategy (Policies 1, 15, 16, 19, 24) and emerging Hinckley & Bosworth Council (HBBC) Local Plan, with this site pursuant to Policy HO01.

2.0 Summary

ATE is not currently in a position to fully support the proposed development. There are various issues and concerns that need to be addressed in order to meet ATE's requirements for the development to deliver the policy requirements for a sustainable, accessible, and inclusive development. It is important that the issues as listed below are resolved before this application is considered for approval.

ATE has undertaken an assessment of the submitted proposals, including the submitted Design & Access Statement (DAS), Transport Assessment (TS), Travel Plan (FTP) and Planning Statement (PS), along with associated drawings and plans.

This assessment has also been considered in line with national planning policy and design criteria as follows:

3.0 National Policy and Guidance

To meet the requirements of government policy, new settlements need to effectively connect to their local area while providing the conditions that prioritise active travel. The following extracts are key considerations in the assessment and recommendations ATE make on planning applications:

The National Planning Policy Framework (NPPF) sets out how:

- Safe and suitable access to the site can be achieved for all users (114).
- the design of streets, parking areas, other transport elements and the content of

associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code (114)

Applications for development should (116):

- give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas...;
- address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- create places that are safe, secure, and attractive – which minimise the scope for conflicts between pedestrians, cyclists, and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

The National Design Guide sets further expectations for Active Travel routes as follows:

82.Prioritising pedestrians and cyclists mean creating routes that are safe, direct, convenient, and accessible for people of all abilities. These are designed as part of attractive spaces with good sightlines, and well-chosen junctions and crossings, so that people want to use them.

Gear change 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. Key requirements of Gear Change sets the following expectations for cycling infrastructure:

- Separation from volume traffic
- Separation from pedestrians
- Cycles treated as vehicles, not pedestrians
- Isolated stretches of good provision are of little value
- Routes must feel direct, logical, and intuitively understandable
- Avoiding cosmetic alterations
- Barriers should be avoided

In relation to new housing developments, LTN1/20 Cycling Infrastructure (2020) sets out how 'new housing development provides a major opportunity to create new and improved cycle infrastructure' (14.3.1), drawing attention to the following aspects of assessment:

14.3.6 It is important that the TA does not overestimate motor traffic travel demands, which could make it difficult to provide well-designed cycle infrastructure, particularly at the site access points. Travel demand forecasts should take into account the potential for the increased levels of cycling that will be enabled by high-quality cycle facilities, both on- and off-site.

Inclusive mobility: provides guidance on designing and improving the accessibility and inclusivity of public transport and pedestrian infrastructure

Active Design: sets out how the design of our environments can help people to lead more physically active and healthy lives in relation to:

- active travel (principle 3) and;
- high quality spaces (principle 5)

4.0 Active Travel Toolkit Assessment

4.1 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).

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

LTN1/20 14.3.6 – over-estimation of motor traffic demands.

4.2 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).

Policy / Guidance References:

For avoidance of doubt these routes should be considered with regards to policies, tools, and guidance within LTN 1-20 (Appendix A and B); the Government's Walking Audit tool; Inclusive Mobility and 'Design for the mind' (PAS 6463).

4.3 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.

Policy/Guidance Reference

NPPF para. 114 "In assessing specific applications for development, it should be ensured that....safe and suitable access to the site can be achieved for all users".

4.4 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).

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;

4.5 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.

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

4.6 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 agreed 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.

4.7 Site permeability: Further Information Required

Overall permeability is generally good – demonstration of a clear hierarchy is 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.

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.

4.8 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).

Policy/Guidance Reference:

National Model Design Code, Part 1: 59 Movement – i) Connected Places, ii) Active Travel.

4.9 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).

Policy/Guidance References:

National Model Design Code Part 2: Movement M.3 - Well Considered parking, servicing, and utilities infrastructure for all users. & M3.ii Cycle Parking

4.10 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.

Policy / Guidance References:

NPPF: 117 – Travel Plans

National Planning Policy Guidance: Travel Plans, Transport Assessments and Statements

5.0 Next Steps

ATE requests that the local planning authority shares this correspondence with the applicant, their agents, and the local highway authority. 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 conditions, subject to receiving this information.