



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

From: Planning & Development Division, Active Travel England

To: Alex Jolley, Hinckley and Bosworth Borough Council

Application Ref: 24/00914/OUT

Site Address: BURROUGHS ROAD RECREATION GROUND,
BURROUGHS ROAD, RATBY, LE6 0XZ

Description of development: Outline planning application (with all four matters reserved apart from access) for a phased mixed-use development comprising about 470 dwellings (Use Class C3) or, in the alternative, about 450 dwellings and care home/extra care facility (Use Class C2/C3). Provision of a community hub (Use Class F2); 1FE primary school (Use Class F1); and associated operations and infrastructure including but not limited to site re-profiling works, sustainable urban drainage system, public open space, landscaping, habitat creation, internal roads/routes, and upgrades to the public highway.

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

Thank you for reconsulting Active Travel England (ATE) on the revised details submitted for this outline application with access considered to deliver up to 920 dwellings. We note there has is direct response to our comments submitted together with the response to other transport bodies, this is accompanied by a series of updated access plans, to support now the proposed spine road crosses Burroughs Road along with its stopping up, and the access arrangements to Desford Lane; which includes a new section of 3m shared cycleway.

Unfortunately, the technical note has not addressed ATE's request for better understanding of local route quality by active modes to key destinations and bus stops, toolkit criteria 2 - 5. These remain a concern and vital to understand whether off site improvements are required to fully support modal shift. Particularly with a development as large as this, access and movement does not stop at the site entrance, as understood by the NPPF paras 109 c) and e), 111 d) and the Core Strategy spatial objective 13 on transportation and sustainable travel, policies 7 and 14. Policies 8 and 14 in particular seek the delivery of safe cycle routes in particular from Ratby to Groby Community College, into Glenfield and Kirby Muxloe and to Timkens employment site. The transport planning work should cover these. It is welcome elsewhere within the note reference is made to supporting the bus service, however.

Since making our comments in November last year the Government has published a revised version of the National Planning Policy Framework, which now includes the requirement at paragraph 109 to have '...a vision led approach to identify transport solutions that deliver well designed, sustainable and popular places.' This change is to build on the more positive 'vision and validate' approach to transport planning, which seeks to plan places proactively by what you want them to look like first, rather than rely on the older model of 'predict and provide' led by worst case scenario modelling for traffic impact. The results of this traditional model have arguably given rise to a decade of missed opportunities for more sustainable housing growth, by way of a failure to avoid car dependent housing, according to the recently published RTPI and LandTech report - The Location of Development 4, published 6 Nov 2024 and available from the Royal Town Planning Institute's website. Active Travel England are encouraging planning decisions to actively consider this report alongside the new NPPF and use the vision of local planning policies to consider sustainable movement first to direct the transport planning approach, rather than rely on transport modelling of motor vehicle trips in the first instance. The transport modelling can then be used secondary to help test the vision for sustainable trips, by assigning these first based on an ambitious mode share and then considering the necessary consequential motor vehicles trips.

2.0 Summary

There remain outstanding concerns regarding the lack of understanding of onward routing outside the site to key destinations. The transport work does not reflect the requirement for a vision led approach. However, the updated data and analysis is useful in setting targets and further analysis and trip assignment would be helpful to understand the design of access infrastructure. The Framework Travel Plan should be updated. Further work on the Burrough Lane and Desford Road access points would be very helpful.

At this stage Active Travel England recommend that any decision on this application be deferred until more information is provided. We would be very happy to discuss our comments in more detail.

3.0 National Policy and Guidance

The revised National Planning Policy Framework published in December 2024 has the following new paragraph numbers important to active travel.

109. Transport issues should be considered from the earliest stages of plan-making and *development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; e) identifying and pursuing opportunities to promote walking, cycling and public transport use;*

...

115. *In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) 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, ...*

117. *Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; c) 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; ...*

Not referred to previously but still important is section 8 Promoting Health and Safe Communities which includes;

96 *Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
- b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and*
- c) enable and support healthy lives, through both promoting good health and preventing ill health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities,*

local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

4.0 Opportunities

Responding in turn to the comment reference numbers in section 4 of the Pell Frischmann technical note (dated 12.02.25) directed to ATE's original comments.

Comment 1. Thank you for presenting a total all day motor trips figure. At 2,679 trips per day this is a huge figure and is a worst case scenario as indicated in the TA. The application must design and invest in sustainable travel and access arrangements, including setting targets for these modes now, to prevent this figure being reached, rather than predominately plan for this figure at motor vehicle access points.

Comment 2. Thank you for acknowledging that the low mode shares for walking and cycling in the base data. School trip rates shown in the tables get close to the 50% national target for active travel, and highlights where layout design will be fundamental to making these walking trips direct, safe and attractive and equally important design for cycles within and from outside the site, table 12 shows very low cycle rates.

It is noted that the Council's own vision for transportation and sustainable travel, Spatial Objective 13, in the adopted Core Strategy is to reduce the high reliance on the car, increase opportunities for other forms of transport and securing improvement to public transport infrastructure and facilities that promote walking and cycling and through the use of travel plans. Active travel also supports Spatial objective 7 to support active and healthy communities through green infrastructure and walking and cycling routes integrated with local public transport and Spatial objective 12 on Climate change by creating sustainable patterns of development, minimising pollution and green house gas emissions. This leads naturally to aiming for high modal shift for this site. The proposal should commit to these percentage targets within the travel plan.

Comment 3 and 4

The basis for our comments on assessing the impacts of active travel traffic is to ensure that the infrastructure proposed is fit for purpose and can take the walkers, wheelers and cycling levels envisioned, and create the right capacity in the right places. It is useful to understand the percentage terms presented which gives an idea of proportions and focus for active travellers, and not surprisingly that 66% of movement will be via Burroughs road. Key to this is design to the correct standards, LTN 1/20 Cycle Infrastructure Design in section 5 specifies design and width by peak hour cycle flow volumes, and ATE we hoping to test the infrastructure proposed against these standards but absolute figures are not presented.

It needs to be noted that shared use (pedestrians and cyclists) can cause conflicts, especially with slower moving pedestrians and mobility scooters and those with visual impairments. Paragraph 1.6.1 (2) in LTN 1/20 states that cycles must be treated as vehicles and not as pedestrians, which shared use does not. LTN 1/20 only supports **shared use paths in a limited circumstances, such as those set out in section 6.5.6.** The specification for such routes depends on likely peak flows so needs to be understood to ascertain an appropriate design. The technical note has not addressed this.

Comment 5

Thank you for setting how the likely routes towards secondary schools. However, this has not addressed ATE's request for a route quality audit, toolkit criteria 2, which is still outstanding. It is good there is connection to the NCN, but what about cycling in darker months is lighting present for instance.

Cycling gives young people real transport independence, contributing to active healthy lifestyles and mental health benefits, lessening air pollution and motor traffic volumes. This is recognised in Core Strategy policy 8 and 14 as cited above.

Comment 6 and 10

It is welcome that a new section of segregated cycling infrastructure and a new parallel crossing is now proposed inside the site as the spine road would intersect with Burroughs Road, the route likely to absorb significant active trips. This hints at a continuation of this infrastructure to the north, but disappointingly not the south. Why would trips originating this way not want this same good quality infrastructure? It remains disappointingly that at this central intersection of a residential growth area is designed around the car and not people. An opportunity for a new village green or town square would have been worth exploring.

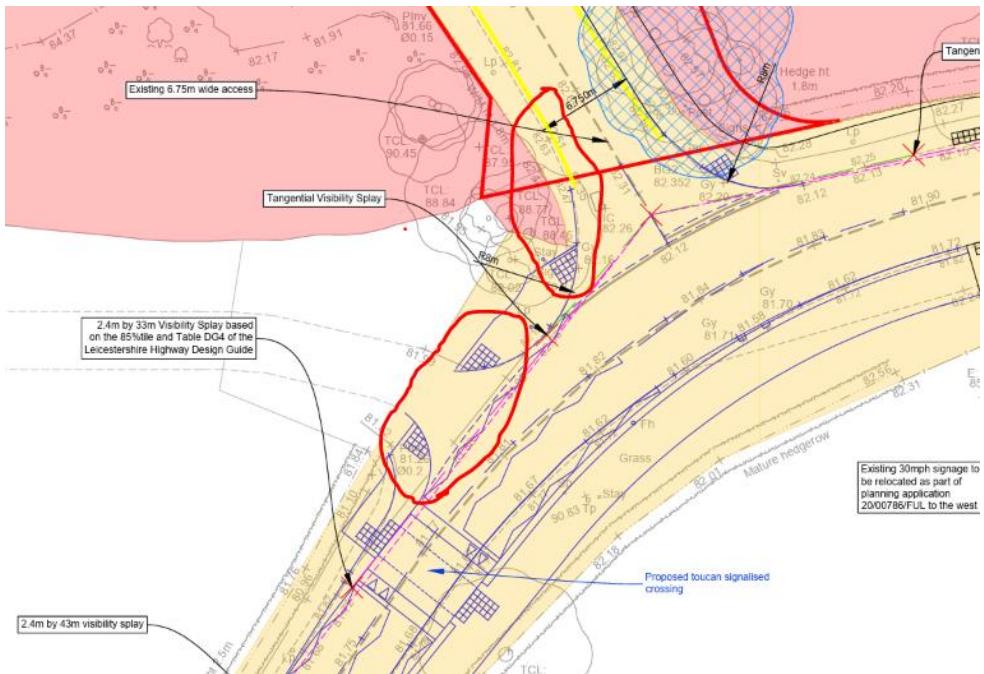
It is disappointing that the note anticipates overall levels of cycling will be below the 300 per hr volumes despite the huge trip numbers referred to above in comment 1, many which could be/should be converted to active modes. Please can more information be provided to show how these movements per hour have been calculated.

Comments 7 & 8

Thank you ATE clarification measures to control speeds on Desford Lane and parking associated with Pear Tree business park. Consequential measures from the Local Highway Authority may also be required to prevent over spill parking. ATE would recommend both these actions are secured against any planning permission by appropriate mechanism.

The design of a Toucan crossing is not on the desire line, but it is noted raised table to the east and extension of 30mph zone will help slow speeds and confident cyclists can remain on the carriageway. However, if using the toucan no concurrent cycling provision routing is included along the north footway despite crossing a separate access road (north of Hollywell Cottage) and there is no transition onto the spine road.

See extract of plan 109003 PEFZZ XX DR TP 00001 below with red circled highlighting the areas described above.



Comment 9

Thank you for clarifying the gradient is sufficient to support wheelers inline with Inclusive Mobility. In designing this section, space to rest and lean for wheelers and those less able against may still be an important consideration where spaces allow beyond the pub car park. Appropriate signage to support 'share with care' within this space should be a planning condition.

The detailed design for this section of Burroughs Road to be stopped could usefully form a design coding condition to closely align the interests of movement, businesses, future residents and the local ecology. It is appreciated that this maybe an important ecological feature but using this as a reason for not investigating lighting further is in direct conflict with local policy on sustainable travel and the NPPF as cited above. This should be weighed in the balance appropriately and the advantages of reductions in pollution for ecology also noted if this route is more thoroughly designed to support active travel. Other vehicle routes from the site may also have existing ecological value but proposals for safety reasons will still be expected to be lit. Why light for motor vehicles and not humans and cyclists? ATE is aware of sensitive lighting products that support ecology. Safety and security for residents needs also noting, one should not have to use a motor vehicle purely for personal security reasons when amenities are close by.

Comment 11

Thank you for clarifying local minimum cycle parking standards which for C1 residential uses match 2020's LTN 1/20 standards. ATE would strongly recommend that provision for dwellings above the local minimum standards be delivered and secured by design code or planning permission.

Comment 12

It is welcome that further data has been tested to increase active travel methods, this is welcome. Every trip should be important and as previously stated ATE is trying to encourage a move away from just planning for peak movements, although acknowledge that infrastructure capacity needs to be designed for this. Can this be added to the framework travel plan as a clear target.

It would be useful to further aggregate these active journeys by likely on site/off site destinations to ascertain likely routing and access points used. This analysis can then be used to help justify the infrastructure at Desford lane and Burroughs Road as discussed above. It also feeds into route audit work and the value of off-site interventions.

Comments 14, 15, 16

Noted. ATE will expect to see more detail on these matters in further reiterations of the travel plan. A planning condition should be used to secure a full travel plan is provided. If a full travel plan can be provided to support reserved matters stages, or design coding, this would allow a closer understanding of likely physical barriers to active travel and the final design and layout of the site to be planning in a manner to help remove these barriers and promote real choice of active modes from the doorstep.