



Active
Travel
England

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Your Ref: 23/01552/OP
Our Ref: ATE/23/00296/OUT
Date: 03 August 2023

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

From: Planning & Development Division, Active Travel England

To: North Hertfordshire District Council

Application Ref: 23/01552/OP

Site Address: LAND SOUTH OF, WATTON ROAD, KNEBWORTH, SG3 6AE

Description of development: Outline planning permission for up to 200 dwellings (including affordable housing), structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation, vehicular access point and associated ancillary works. All matters reserved except for means of 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

Active Travel England (ATE) welcomes the opportunity to comment on this outline application for up to 200 dwellings which is submitted with all matters reserved except access. The proposal site is located to the south of Watton Road, Knebworth and measures approximately 14.74 hectares in size comprising 3 irregularly shaped field parcels that immediately adjoin the existing built form of Knebworth. It is also located approximately 5 km south of Stevenage and approximately 9 km north of Welwyn Garden City.

After undertaking a full assessment of this application, it is understood that the site is allocated in The North Hertfordshire Local Plan 2011 - 2031 (Policy KB4) for 200 dwellings (Land East of Knebworth). The site also falls within the Knebworth Neighbourhood Plan area with Policy KBBE8 (Land East of Knebworth) being of relevance.

ATE understand this is the second planning application made on the site for a similar development. The first application (planning application one) was submitted in August 2021 and appears to have been withdrawn. Based on the information provided at Paragraph 3.2.4 of the submitted Planning Statement, the main relevant changes made between planning application one and this application are:

- Alterations to the site's proposed design and layout; and
- Amendments to the site's access strategy, with new offsite highways works also included as part of the proposals;

The Planning Statement also includes the Illustrative Masterplan for planning application one versus this new application.

It is therefore clear that the site has been subject to historic planning considerations by the LPA, consultees, and applicants. These deliberations have included an assessment of layout, accessibility and active travel requirements and it's likely that opportunities put forward in this response will have been mooted in the past. Nonetheless, ATE trust that the comments are helpful in the LPA's review of this application.

2.0 Summary

Whilst it is acknowledged that much of this application is currently at outline stage, there are numerous active travel matters that require attention in accordance with policy to ensure that sustainable development can be delivered in a way that enables and embeds walking, wheeling and cycling as the first natural choice for local journeys.

The quality of proposed active travel infrastructure and the means by which new residents of the development will access homes, local facilities and their place of work is of relevance. This will have a direct bearing upon the residual impacts of the development, but more importantly the health, lifestyles, and social inclusivity of future residents.

NPPF paragraph 105 prescribes, for the purpose of promoting sustainable transport, that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Whilst the site is undeveloped and semi-rural in nature, it is located adjacent to the existing settlement of Knebworth and in close walking and cycling distance of the local centre, educational facilities, and transport nodes. There are however no existing dedicated footpaths or cycleways from the site to any of these locations.

It will be important therefore to improve the quality, convenience, and safety of routes to and from the site to ensure walking and wheeling are a viable choices for residents and visitors to the site.

After considering the proposals, ATE is requesting that the application is deferred and requests further assessment, evidence, revisions and/or dialogue as set out in this response.

3.0 National Policy and Guidance

The National Planning Policy Framework (NPPF) states:

104. Transport issues should be considered from the earliest stages of... development proposals, so that: c) opportunities to promote walking, cycling and public transport use are identified and pursued;

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...;

113. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Local Transport Note 1/20 (LTN 1/20) provides guidance to local authorities on delivering high quality, cycle infrastructure, while paragraph 14.3.1 identifies that new housing development provides a major opportunity to create new and improved cycle infrastructure.

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, while recognising that the planning system can contribute to the achievement of sustainable development. 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.

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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. It states that through the NPPF, the National Design Guide and the National Model Design Code, places that prioritise activity, health and the characteristics that underpin active environments are encouraged and recommended.

4.0 Opportunities

As discussed, the site forms part of a strategic allocation which extends to 14.74 hectares with previous consideration gone into establishing the most appropriate form of development for this site. The Design and Access Statement sets a vision for the *‘To establish a legible environment, with a choice of interconnecting attractive streets and pedestrian and cycle routes which provide excellent connectivity across the site and into both Knebworth and the surrounding countryside.’*

It goes on to identify key urban design principles, one being to *‘maximise pedestrian and cycle connectivity with the existing urban edge of Knebworth and the surrounding countryside; and ‘A layout that encourages people to walk and cycle and to use the Primary Street;’*

ATE supports and welcomes these aspirations.

The site has great potential to prioritise active travel journeys. There are currently three accesses into the proposed site and potentially a fourth in the south of the site. Two of these will be for pedestrians and cyclists only, which is supported. Proposals have been put forward to upgrade and integrate these routes into the proposals, however there is some concern with regards to their adequacy, which is discussed further below.

5.0 Areas of Concern

Outline proposals and layout

The Illustrative Masterplan 7521-L-03 includes a network of streets and footways throughout the site. Whilst these routes are in outline, ATE suggests there is an opportunity to deliver dedicated cycle paths through the site along the main spine road rather than a combined path as proposed. This is particularly important given the diversion of traffic travelling from the east along Swangleys Lane and through the site following the stopping up of the western stretch of Swangleys Lane. Further justification for keeping this route open to vehicle movements is required as limiting through traffic could significantly improve the quality, character, and safety of the site for pedestrians in accordance with NPPF paragraph 112 c.

Access and arrangements and offsite active travel infrastructure

Policy KB4 Land east of Knebworth of North Hertfordshire Local Plan 2011 – 2031 states that the *‘Transport Assessment to consider the cumulative impacts of sites KB1, KB2 and KB4 upon key junctions and rail crossing points for all users, including walkers and cyclists, and secure necessary mitigation or improvement measures;’*

Policy KBBE8 Site KB4 Land east of Knebworth Neighbourhood Plan *‘seek to improve pedestrian access and safety along Watton Road and Swangleys Lane;’*

Paragraph 3.2.17 of the Planning Statement sets out that *‘At Swangleys Lane, in place of a roundabout, it is now proposed to stop up the westbound part of Swangleys Lane immediately adjacent to the site red edge and create a pedestrian/cycle access only.’*

Notwithstanding the above comments, this approach will help reduce vehicle movements along Swangleys Lane, which will also serve as the primary pedestrian route for Knebworth Primary School from the site. There are however no existing footways for some 135 m from the site heading west towards the school. ATE recognise there are width limitations, however proposals put forward in 0301-P04 - Pedestrian and Cyclist Provision could go further. For example, a shared surface the length of Swangleys Lane from the junction with London Road to the Junction with Old Lane and in accordance with 5.2.2. of Roads in Hertfordshire: Highway Design Guide 3rd Edition would improve the overall pedestrian environment and help address safety in accordance with Policy KBBE8 of the Neighbourhood Plan.

To guarantee active travel permeability, the footpath connection south into Haygarth should be secured and adopted by the local highway authority as far as the red line boundary of the site, as identified on The Illustrative Masterplan 7521-L-03.

There is currently no footway between the site entrance and the junction with Bell Close and Watton Road and the proposals are reliant on a footway within the site to address this. To ensure pedestrians accessing the site from the west do not walk along Watton Road towards the vehicular access with Old Lane, pedestrian and cycle access must be clearly marked and upgraded to ensure compliance with Inclusive Mobility guidance and Policy KBBE8 of the Neighbourhood Plan.

The site is within walking distance of the station, however the footpath along Station Road underneath the railway bridge appears narrow. Again, thought should be given towards upgrading this in accordance with Inclusive Mobility guidance as part of wider highways improvements.

Travel Plan

NPPF paragraph 113 states all developments that will generate significant amounts of movement should be required to provide a travel plan. Travel plans must clearly outline the mode share targets and proposed measures to achieve these, monitoring strategy and remedial measures to be implemented if targets are not met. Agreed travel plan measures should be secured either by way of planning obligations or conditions.

The Travel Plan sets out at Paragraph 2.7 that *‘In the absence of an occupied site, mode-share data for journey to work, taken from the results of the 2011 Census, have been used to establish a baseline for targets.’* Based on these figures, 65.4% of residents would drive a car or van to work with just 7% walking and 1.2% cycling.

The Travel Plan also states that *'A baseline travel survey of residents' trip-making behaviour will be carried out in the period three to six months after occupation of the 50th dwelling on the development.'*

The submitted Travel Plan and Transport Assessment should provide further detail on the level of active travel trips that are forecast to be generated and why these are so low. Details of the infrastructure to be provided and how its use will be embedded by the initiatives in the Travel Plan should be outlined. Details of actions 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 planning conditions / S106 obligations. The travel plans should be supported and funded until the targets are met and sustained for a set period.

6.0 Next Steps

We request that these recommendations are provided to the LPA case officer and forwarded to the agent and applicant. 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 wording for planning conditions and obligations.