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Your Ref: PL/2023/07216
Our Ref: ATE/23/00529/OUT
Date: 21 September 2023

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

From: Planning & Development Division, Active Travel England

To: , Wiltshire Council

Application Ref: PL/2023/07216

Site Address: Land at Penn Hill, Calne,, Wiltshire,, SN11 8RR

Description of development: Outline planning application with all matters reserved (except for access into the site) for the proposed development of up to 205 residential dwellings, and 0.75ha of employment land and ancillary uses, open space, vehicular and pedestrian accesses, landscaping, drainage measures and all other associated works including the demolition existing buildings and structure.

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 planning application for the development of up to 205 dwellings and 0.75ha of employment land. The total area of the site is approximately 15.1ha and is located northeast of Calne with access proposed from Sandpit Road and to Oxford Road through neighbouring developments.

The site is not allocated for development within the adopted local plan (Wiltshire Core Strategy), however it is noted from the submitted planning statement that the site forms part of an allocation within the emerging local plan (draft Local Plan Review). However, this plan has only undergone the earliest stage of consultation and has not undergone any examination and as such limited weight can be applied to this document. Policy 11 of the draft Local Plan Review is relevant to the application site here and details the following. *"Land to the north of Spitfire Road, Calne, as identified on the Policies Map, is allocated for the development of approximately 570 dwellings, local centre, 80 place nursery and 0.5ha employment land for office use."*

In view of the timing of this application, ATE is keen to understand from the Local Planning Authority (LPA) whether there is sufficient comfort that the emerging Local Plan is at an advanced enough stage from a policy perspective to be able to be used as a material consideration to determine this application. Notwithstanding the above issues relating to the timing of this application, ATE has undertaken an assessment of the proposals against the criteria set out in its Planning Assessment toolkit and national planning policy and active travel design guidance.

2.0 Summary

The means by which residents of the development will access homes, local facilities and their place of work, together with how they undertake internal trips is of key concern. This will have a direct bearing upon the residual impacts of the development, but more importantly the health and lifestyles of future inhabitants of the development and the wider area. It is therefore paramount that key active travel principles are agreed at outline stage to ensure these are followed through at reserved matters and beyond.

While ATE acknowledges that much of this application is currently at outline stage, there is a requirement for it to clearly demonstrate how it will avoid residents of the site being car-dependent and provide a genuine choice for active travel modes. Although ATE is not recommending refusal at this stage, significant concern is raised regarding the quality of active travel infrastructure in the vicinity of the site and the level of detail provided in regard to the assessment of active travel from the site. For ATE to support the development, the application should demonstrate that pedestrians and cyclists have been given priority in movements from the site to the nearby employment area, the primary schools and in routes to the town centre and ATE advises that this will likely require significant improvements to existing infrastructure.

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. More specifically relevant to this application is section 6 – Space for cycling within highways, and section 10 – Junctions and crossings.

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. Active Travel England's responsibilities for walking also extend to "wheeling", such as the use of wheelchairs (self-propelled or powered) and mobility scooters.

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.

4.0 Opportunities

The primary opportunities at the development site are its proximity to the employment area west of the site, which is within a short walking distance. Additionally, the size of Calne means that, if the routes are attractive, the distance from the site to the town centre is not in itself a barrier to providing most people with the choice to make this journey using active travel modes.

5.0 Areas of Concern

In its current form, this application does not demonstrate a commitment to how the proposed development will ensure that active travel modes are prioritised and further assessment and improvements are required. Within the emerging draft Local Plan Review in relation to the wider allocation Policy 11 states, "*A single comprehensive Masterplan, phasing and delivery strategy for the development, must be prepared and approved by the Local Planning Authority in advance of any planning application being submitted for the*

whole or part of the allocated site. This must take account of the requirements of this Policy." It goes on to require, "*an enhanced crossing between Spitfire Road and Abberd Lane for walking and cycling use;"* and "*measures to positively support walking, cycling and public transport use between the site and Calne town centre".*

While ultimately the level of weight that this policy has will be up to the judgement of the LPA, ATE would raise a concern that the development does not represent a single comprehensive masterplan for the whole allocated site and also does not clearly provide measures to positively support walking and cycling, or improved crossings and connections. If, contrary to the draft Local Plan Review, the allocation was to come forward in piecemeal developments then it is essential that each contributes towards providing the necessary active travel infrastructure improvements to Sandpit Road, Oxford Road and Spitfire Road. In its current state, ATE considers the application to be contrary to paragraphs 104(c), 110(a), 112 and 113 of the NPPF.

Transport Assessment and Travel Plan

Consideration to where the improvements, and the level of these improvements, to the active travel infrastructure are necessary and should be guided by a thorough quantitative and qualitative assessment of active travel and the development. ATE would advise that these additional assessments are included within an amended Transport Assessment and within a Travel Plan. ATE would suggest as a minimum this additional assessment should cover the following;

Quantitative assessment of active travel trips

The Transport Assessment has not forecasted the level of trips by all modes likely to be associated with the development, as required by National Planning Policy guidance on Travel Plans, Transport Assessments and Statements. This does not represent a sound basis upon which to forecast the needs for active and sustainable travel, nor does it demonstrate a commitment to improving and enhancing active travel networks that serve the site. ATE therefore expects the applicant to present a multi-modal trip generation analysis of all modes of transport throughout the day.

Qualitative assessment of active travel routes

Within section 3 of the Transport Assessment limited attention is paid towards the deficiencies of the surrounding walking, wheeling and cycling network and how these can be best improved. A more detailed qualitative analysis of key routes from the site is required which critically assesses the provision of crossings, footways and cycle lanes/tracks and how those walking, wheeling and cycling are prioritised. The Level of Service Tool and Junction Assessment Tool in LTN 1/20, and a Walking Route Audit Tool, should be used to assess key routes and develop appropriate schemes compliant with current standards. ATE would advise routes to the following destinations should be assessed:

- Primary schools;
- Calne town centre;
- Employment area west of Oxford Road.

Travel Plan

No Travel Plan has been submitted as part of the application as is required by paragraph 113 of the NPPF. The Travel Plan should accompany and support the Transport

Assessment and provide details of the infrastructure to be provided and how its use will be embedded by initiatives and incentives. These should be outlined and committed to within a draft Action Plan. Even at outline stage, initial mode share targets should be indicated and 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 the planning conditions / S106 obligations.

Existing active travel infrastructure

ATE has identified the infrastructure below as of particular concern and would recommend that further assessment may wish to give particular focus to these areas.

Sandpit Road

- Through this proposed development, and should the wider allocation come forward, Sandpit Road would become enclosed within the Calne urban area. ATE would therefore expect the active travel infrastructure of the highway to be brought up to the standard expected of a road within the urban area. This should include space within the highway for both pedestrians and cyclists. Currently, there is only a footway on the northern side of Sandpit Road, with no space allocated for cyclists. The carriageway is wide, not overlooked by dwellings and relatively straight, and as a result may lead to vehicles travelling at higher speeds; the carriageway is likely to only be an attractive option for the most confident cyclists. This would mean all pedestrians and cyclists would share the footway on the northern side of the highway which is not acceptable.

- Within the application and the Transport Assessment no reference is made to the Wiltshire Local Cycling and Walking Infrastructure Plan LCWIP (Framework Plan and Interurban Routes 2022). Within this document there are overall active travel aims and principles that should guide new development, but also specific references to Calne and this includes creating a cycling link along Sandpit Lane to Spitfire Way. This development would represent an opportunity to deliver this and LTN 1/20 compliant cycle lanes making this connection would be supported.

- Overall, a clearer strategy that includes a commitment to improvements to Sandpit Road that will prioritise walking, wheeling and cycling is required.

Oxford Road

- Oxford Road is to the west of the site and is positioned between the site and a principal employment area within Calne. It is also a primary arterial route into Calne. South of the access to the High Penn Park development there is only a narrow footway on one side of the highway and no provision for cyclists. There appears to be a pedestrian and cyclist path between the two phases of this development, however there is no dropped kerb to provide step-free access and where this meets Oxford Road there is no footway or crossing point. Routes from the site to the employment area west of Oxford Road are therefore indirect and with limited provision of footways and crossings. Further assessment should consider how those walking, wheeling and cycling will navigate Oxford Road is required.

Crossings

- On both Sandpit Road and Oxford Road there appears to be a lack of crossings that give priority to pedestrians and cyclists and as a result the development site will feel separated from Calne for pedestrians and cyclists.

- A toucan crossing on Sandpit Road should be considered where the public right of way would connect through to Comet Crescent, this should be accompanied by improvements to the access from the public right of way onto this footway. Presently this access appears to include uneven ground, barriers and steps which will prohibit those using wheelchairs, mobility scooters, pushchairs or bicycles from making this connection.

- There are also few crossings for pedestrians and cyclists on Oxford Road. Pedestrians and cyclists would need to cross this road to reach the employment area and Marden Vale and Saint Edmunds Primary Schools. ATE would advise that there should be two controlled crossings on Oxford Road and the development should play a role in contributing towards these.

6.0 Next Steps

In consideration of the above ATE, recommend that the Local Planning and Highways Authority considers the following points to discuss with the applicant:

- Submission of an amended Transport Assessment and submission of a Travel Plan that include a more detailed qualitative and quantitative assessment of active travel routes from the site, with the principal of off-site improvements to be outlined. This should be carried out with the overall intention of giving genuine priority to pedestrian and cycle movements, both within the scheme and to neighbouring areas to ensure that active travel modes represent a desirable choice for journeys to school, work and the town centre. Improvements should comply with LTN 1/20 and should also be guided by the aims and principles of the Wiltshire Local Cycling and Walking Infrastructure Plan LCWIP (Framework Plan and Interurban Routes 2022).

ATE requests that the local planning authority shares this correspondence with the applicant and their agents. ATE would be content to review further submitted information to help address the above identified deficiencies with a view to providing a further response, subject to receiving this information.