



Active
Travel
England

Active Travel England
West Offices
Station Rise
York
YO1 6GA
Tel: 0300 330 3000

Your Ref: F/24/96895
Our Ref: ATE/24/00494/FULL
Date: 15 May 2024

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

From: Planning & Development Division, Active Travel England

To: Eastleigh Borough Council

Application Ref: F/24/96895

Site Address: Land West of Burnetts Lane and North of Fir Tree Lane, Horton Heath,, Eastleigh

Description of development: Construction of areas of Green Infrastructure for the One Horton Heath Development, including open space, landscaping, bridleways (to include an upgrade and diversion of an existing Public Right of Way and causeway works), footpaths, SuDS, play areas and ecological and biodiversity enhancements (proposal constitutes EIA development)

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 full planning application which relates to outline permission O/20/89498 for 2,500 homes at Land West of Burnetts Lane and North of Fir Tree Lane (the site). To date, ATE has not been involved in the outline application pertaining to this full application.

Also, of relevance are recently consented or submitted applications which deal with the construction of a link road and also an application for an internal distributor road, footways and cycle paths. Again, ATE has not been involved in either of these applications.

2.0 Summary

It is acknowledged that opportunities are limited due to the nature of this application and previously submitted proposals. However, these proposals will have an influence on active travel movements within and across the site. These have been summarised below and elaborated on further in the Areas of Concern section.

1. Proposed widths and use of footpaths and bridleways
2. Proposed surface of footpaths and bridleways
3. Further details on 'Gateway Features'

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 Areas of Concern

The 'Overall Green Infrastructure Landscape Proposals' shows three primary paths, comments have been provided on each below.

1. Proposed Rural Bridleway Suitable for Cyclists

It appears this route will be 3 m in width. There is concern that this is inadequate to deal with the intended users, especially when passing. This issue is exacerbated by the potential for hedgerows to reduce usable width once overgrown. It is suggested that this route is increased to a minimum of 4 m in width.

It has not been possible to establish a definite proposed surface type for this route.

Surfacing (The below comments on surfacing apply to routes 1 and 2)

LTN 1/20 (15.2.1) states that surface quality affects the comfort and effort required when cycling. Loose surfaces such as gravel or mud can also present a skidding hazard, increase the risk of punctures and make cycles and clothing dirty in bad weather. The use of gravel-filled cellular pavements does little to reduce this concern. Smooth, sealed solid surfaces offer the best conditions for everyday cycling. Loose surfaces are also not suitable for wheelchair users.

ATE is aware of a number of examples of where a non-sealed surface has worn badly and became unsuitable for cycling or wheeling. Gravel surfaces can often be loose and dusty, have poor skid resistance, and are not durable. Given the increase in population in this area, it would seem sensible to insist on a surface that can support future high levels of use without becoming unusable or requiring a high level of maintenance.

Loose material is not suitable for wheelchair users. *Inclusive mobility: making transport accessible for passengers and pedestrians* states on page 124 in the chapter on Access to the Countryside states that ‘All path surfaces should be compact, firm and stable’ and that ‘Loose sand, gravel, woodchips and cobbles should not be used’. The use of such material in this location must ‘address the needs of people with disabilities and reduced mobility in relation to all modes of transport’ as required by NPPF paragraph 112 b.

Given the clear and obvious need to minimise impact on tree routes and ecology, ATE recommends a system using flexipave or other bound sealed recycled rubber crumb surface is preferred, as shown below on the Trans-Pennine trail. Lighting will also need to be considered, as it is not valid to only assume use of this route during daylight hours, particularly for people to feel safe and have adequate visibility. As with surfacing, low-impact and sympathetic solutions should be sought such as bollard lighting and baffles that direct light in a particular direction (away from habitats).



2. Proposed Rural Footpath Suitable for Pedestrians

It is unclear who the intended users of this footpath are. ATE would not support restricting this path to any single active travel user group (i.e. excluding cyclists). It is highly likely that both pedestrians, cyclists and indeed those using mobility aids will seek to use this route. Subsequently, its width should be increased to cater for these movements. Whilst it is noted that these routes are described as ‘rural’, the presence of 2,500 homes and other uses will result in an urbanising effect and path design should be mindful of this.

The above comments on surfacing also apply to these routes.

3. Proposed Tarmac footpath to Burnetts Lane

There are no concerns with this route.

Gateway Features

It is not clear what is meant by ‘Gateway Features’. For clarity, ATE would discourage the use of bollards.

See LTN 1/20 1.6 Summary Principles which states that:

16) Access control measures, such as chicane barriers and dismount signs, should not be used.

And

Inclusive mobility: making transport accessible for passengers and pedestrians, which states that:

7.6 Traffic calming, speed reduction and access control measures:

As a principle, access control measures, such as staggered barriers that require cyclists to dismount, should not be used. This is because they both reduce the usability of a route for everyone and may exclude users of 'nonstandard' cycles. Physical interventions should not be used to, for example, reduce the speed of cyclists approaching a junction; instead, cyclists should be provided with good sightlines and road markings to alert them to the need to take care and give way to pedestrians or other traffic.

5.0 Next Steps

It is requested 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.