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Your Ref: PAP/2024/0024  
Our Ref: ATE/24/00105/OUT  
Date: 15 February 2024

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

From: Planning & Development Division, Active Travel England

To: North Warwickshire Borough Council

**Application Ref:** PAP/2024/0024

**Site Address:** Land On The North East of J10 M42 Dordon/A5, Polesworth

**Description of development:** Outline planning permission for development of land within Use Class B2 (general industry), Use Class B8 (storage and distribution) and Use Class E(g)(iii) (light industrial), and ancillary infrastructure and associated works, development of overnight lorry parking facility and ancillary infrastructure and associated works. Details of access submitted for approval in full, all other matters reserved

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 a proposed development of up to 100,000sqm of employment uses and 150 space overnight lorry park (including an associated 400sqm amenity block) on land to the northeast of M42 Junction 10.

## 2.0 Summary

- ATE welcomes the improvements made to the foot/cycleway running parallel along the A5 Watling Street fronting the site. However, it is recommended that a condition is applied to ensure that appropriate lighting is provided along the route.
- Forecasting daily active travel movements generated by the development should be included in the Transport Assessment. Currently, the analysis presented provides very little basis / or evidence upon which to inform travel plan measures.
- The Transport Assessment does not confirm the amount of cycle parking that would be provided. Further information on the location and type of parking is also requested to ensure compliance with LTN 1/20 guidelines.
- Similarly, the Transport Assessment notes showers and lockers would be provided. However, further information on the location in relation to the cycle parking is requested.
- Finally, it is recommended that bus stops in the vicinity of the site are upgraded.

## 3.0 National Policy and Guidance

**These proposals have been assessed in accordance with the following national planning policy and design guidance.**

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

*108. 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.*

*114. 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.*

*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*

*116. ...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 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;*

*117. 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.*

Gear change: a bold vision for cycling and walking - 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.

A key requirement of Gear Change is to set the following expectations for new 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*

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.

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.

Paragraph 82 of the National Design Guide (Planning practice guidance for beautiful, enduring and successful places, 2021, states:

*Priority is given to pedestrian and cycle movements, subject to location and the potential to create connections. 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. Public rights of way are protected, enhanced and well-linked into the wider network of pedestrian and cycle routes.*

## **4.0 Areas of Concern**

### **Shared use foot/cycleway**

The “Proposed Layout for A5 and New Site” (drawing number: 0002, 0003 and 0004) illustrates a proposed 3m-wide shared use foot/cycleway that runs eastwards from the site entrance. ATE welcomes the proposed works as it would offer a suitable active travel link between the site and Dordon, a village east of the site.

ATE recommends that a condition is applied to ensure that appropriate lighting in accordance with LTN 1/20 and Cycle Infrastructure Design would be provided along the proposed shared use footway/cycleway.

### **Quantification of Active Travel trips absent**

Quantification of daily active travel movements generated by the development is missing from the Transport Assessment and therefore the analysis presented provides very little basis or evidence upon which to inform travel plan measures. ATE therefore expects the applicant to present a multi-modal trip generation analysis of all modes of transport throughout the day, rather than the analysis being confined to peak hour periods.

### **Cycle Parking**

The Transport Assessment notes that cycle parking would be provided greater than the North Warwickshire standards, although no figure is provided. Parking standards required for use class B2 is 1 space per 500 sqm. As such, a total of 200 cycle spaces should be provided.

LTN 1/20 (Chapter 11) prescribes that around 5% of spaces should be provided for non-standard cycles to accommodate people with mobility impairments/larger bicycles. It is also not apparent the distance the cycle parking would be from the showers and lockers, and the type of parking proposed, to ensure it is in a secure and covered location in line with LTN 1/20 guidance.

### **Staff Facilities**

11.7 of LTN 1/20 advises that to facilitate longer cycle commutes, places of work should have changing rooms, lockers, showers and drying rooms. The Transport Assessment notes that showers would be provided. However, it should be made clear which of these facilities will be provided within the new development. If these are located within the units, details should be provided of what these facilities are, their size, and where they are located in relation to cycle parking.

### **Bus Stops**

The closest bus stop is located at the northern edge of the A5, approximately 150 metres to the east of the existing access, and comprises a pull-in layby with no flag and pole arrangement. It is noted by Drawing 0002 in the Transport Assessment that the closest bus stop and layby would be relocated approximately 50 metres to the east.

To access westbound services, the closest bus stop is located within the Birch Coppice Business Park, approximately 870 metres to the southeast of the site access. Further bus stops are located on Birchmoor Road, approximately 350 metres north of the site. All bus

stops are in the form of a flagpole, with no real-time bus information, raised kerbs, shelter, lighting or seating.

These facilities in their present state are neither attractive or inclusive and therefore fail to meet current standards. As these are the closest to the employment site, which has the potential to employ up to 2,777 employees (using the Employment Densities Guide), these facilities should be updated to provide suitable shelter and real-time information.

## **5.0 Next Steps**

It is requested that these recommendations be forwarded to the planning case officer in addition to the applicant and its agent. ATE would be content to review further submitted information with a view to providing a further response and recommended wording for planning conditions and obligations.