



Active
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Your Ref: 24/2073/OUT
Our Ref: ATE/25/00128/OUT
Date: 11 February 2025

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

From: Planning & Development Division, Active Travel England

To: Three Rivers District Council

Application Ref: 24/2073/OUT

Site Address: Land To North Of Little Green Lane, Croxley Green, WD3 3SP

Description of development: Outline Application: Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for childrens social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and cafe provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (Layout, scale, appearance and landscape as reserved matters).

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. This is ATE's first involvement with the proposal site; however, it is noted that standing advice was issued in response to a pre-application engagement request, as ATE does not currently provide detailed advice at the pre-application stage.

It is understood that the site is not allocated within the current Local Plan (2011); however, it has been considered as part of evidence gathering for the preparation of a new Local Plan.

2.0 Summary

ATE has reviewed the application against the criteria in the updated planning assessment toolkit, national planning policy, and active travel design guidance.

The proposals demonstrate strong potential to support active travel, with the site being sustainably located and offering opportunities to access surrounding services and amenities via active modes. However, certain aspects require further consideration, leading to a deferral response. ATE requests additional information and analysis to address these matters, detailed below.

3.0 Areas of Concern

1. Trip Generation and Travel Plan Targets

Trip Generation:

Expected trip rates for walking, wheeling, and cycling journeys are not clearly provided in the Transport Assessment (TA) and appear to focus solely on vehicle trips. Trip rates should be provided for active modes as all-day trips rather than being restricted to peak hours. The trip generation for active modes should consider all onsite uses, not just residential elements.

Travel Plan:

The Travel Plan lacks targets for active modes and instead relies on 2011 Census Journey to Work (JTW) data to establish a baseline modal split, intending to update this with surveys post-occupation. This approach is disappointing, given the site's high potential for active travel. Reliance on outdated census data results in a less ambitious starting point. Recognising the limitations of the 2021 Census, adopting a vision-led approach and incorporating alternative data sources, such as the National Travel Survey, could help establish robust, forward-looking targets in line with the updated NPPF.

2. Active Travel Route Audit

Section 4.0 of the TA assesses the distances to local facilities and opportunities for sustainable and active travel. While it identifies several destinations accessible on foot or by cycle, it does not include maps to illustrate key routes. The assessment provides photographs and commentary on walking routes but lacks a cycling audit, unlike the walking audit.

While the walking audit identifies some areas for improvement, a more critical evaluation is required, considering:

- National Design Guide
- Inclusive Mobility Guidance
- The five core design principles of LTN 1/20, which apply to both cycling and walking routes

The Watford and Three Rivers Local Cycling and Walking Infrastructure Plan (LCWIP), attached in Appendix A of the TA, applies similar principles. It would be beneficial for the applicant to provide a comparable level of assessment with maps.

3. Accessibility

Walking and Cycling – Access to Services:

The development site is well located for accessing services, as confirmed in Table 3 – Distance to Local Facilities of the TA. However, when assessing accessibility, it is essential to evaluate the quality of routes. As noted, the route audit should be expanded to cover a broader range of facilities. While proposed commercial and educational facilities will improve accessibility, residents will likely need access beyond the site boundary.

Access to Public Transport:

Public transport journeys typically start and end with active travel. Ideally, developments should be within:

- 400m of a high-frequency bus stop
- 800m of a rail station

The TA states the nearest bus stop is 750m away at Durrants Drive/Baldwins Lane. The nearest underground station (Croxley) is 1.8km away, and the closest National Rail station is a 15-17 minute cycle ride, making it inaccessible by foot to most users.

While the site is generally well served by public transport, the distance to the nearest bus stop exceeds the recommended standard. The proposed new bus service within the site could improve access, but further details on funding, frequency, routes, and operating hours are needed.

4. Off-Site Infrastructure Improvements

Access Arrangements:

Two vehicular accesses via Links Way and Durrants Drive are proposed. While these allow logical, direct routes into the site, improvements are needed to facilitate east-west pedestrian and cycle connections along Little Green Lane in terms of materials and crossings. The Design and Access Statement (DAS) illustration (p.146) suggests this, but the detailed drawings do not reflect it.

Further Improvements:

- New Pedestrian & Cycle Links:
 - A shared footway/cycleway connecting the site to Croxley Danes School and Baldwins Lane.

- Pedestrian/cycle priority at junctions along this route.

While the principle of off-carriageway walking and cycling infrastructure is welcome, ATE does not generally support shared-use paths unless they meet limited exceptions in LTN 1/20. The proposed route interacts with driveways, creating potential conflicts with both vehicles and pedestrians and ultimately amounts to conversion of a footpath. Moreover, it appears pavement parking is prevalent along this route, however no detail on how this will be managed is provided. Alternative measures should be considered, including managing pavement parking, enhancing placemaking and introducing traffic calming which reduces conflicts, to ensure this route is attractive to all users.

- Upgrades to Public Rights of Way (PRoW):
 - Footpath 17 improvements towards West Hertfordshire Golf Course.
 - Enhancements to PRoWs 63 and 18 to improve connectivity.
- Cycle Route Integration with LCWIP:
 - Contributions to the cycleway along The Green.
 - Cycle priority improvements along the A412 corridor towards Watford.

Discussions with the PRoW and Highway Authority are needed to determine appropriate contributions. It is considered that there is a significant opportunity to benefit from the proximity of the site to existing PRoW network.

5. Permeability and Placemaking

The proposals are currently in outline form, which typically limits the level of detail available for comment on permeability and placemaking. However, the submitted road layouts provide an opportunity to influence design at this stage.

Permeability

Detailed comments on internal permeability will be provided at an appropriate time. It is disappointing that the submitted Land Use Parameter Plan only reserves land for vehicular access.

The DAS includes an Indicative Pedestrian and Movement Strategy, but it is concerning that while this plan identifies several potential access/egress points for cyclists and pedestrians, it does not seek to secure them. While it is recognised that the layout is not fixed, it is crucial to guarantee a minimum number of dedicated access points for cyclists and pedestrians. Additional opportunities to secure links include:

- Southwest corner – to create a dedicated link to Little Green Junior School.
- Southeastern corner – to facilitate a link to Rousebarn Lane and onward to Croxley Danes School.
- Northeastern corner – to connect towards footpaths 017 and 031 leading to Watford.

The boundary along Little Green Lane should remain open to prevent disconnection from the built-up area to the south. Walking and cycling links into the site should be abundant to ensure the development remains integrated, especially given the number of proposed services on-site and paying regard to NPPF 96a.

Shared Use

It is understood that the Boulevard will feature a 3m-wide foot/cycleway. As previously discussed, ATE does not support shared-use facilities, particularly in residential areas where pedestrian flows are high. While it is acknowledged that vehicle traffic will generally be low-speed and low-volume, shared-use paths can lead to conflicts between cyclists and pedestrians.

Consideration should be given to:

- Providing segregated facilities on both sides of the highway; and/or
- Enhancing placemaking by reducing carriageway widths.
- Restricting on-street parking to create a safer and more accessible environment for active travel.

These measures would help prioritise safe and inclusive movement throughout the development.

6. Cycle Parking

- It is understood that cycle parking provision will comply with local standards. Thought should also be given LTN 1/20 standards. Parking should be as convenient as car parking with unobstructed access to secure facilities provided by the developer.
- The need for further cycle parking provision should be explored at Croxley Underground Station.
- The expansion of Beryl Bikes is welcomed.

4.0 Next Steps

ATE acknowledges the strong potential of this development to support active travel but requests further information and amendments to trip generation analysis, infrastructure design, permeability, and public transport integration before providing full support.

ATE requests that the Local Planning Authority share this response with the applicant's agent. Additional details and amendments in line with the above comments would be welcomed, with a view to providing further feedback and appropriate wording for conditions as required.