



Active
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Your Ref: 24/2073/OUT
Our Ref: ATE/25/00128/OUT
Date: 28 July 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 provide comments on this further consultation. ATE previously submitted a response dated 11 February 2025, recommending that the application be deferred pending the provision of additional information. That previous response should be read in conjunction with this updated consultation response.

ATE notes that the application has since been amended, with revised plans and supporting documentation now submitted.

Following a review of the revised proposals, ATE is issuing a conditional approval. Further context for this decision is set out below, with reference to the specific issues previously raised.

2.0 Summary

1. Trip Generation and Travel Plan Targets

• Trip Generation:

ATE requested the following:

- Provision of expected trip rates for walking, wheeling and cycling, not solely vehicle trips.
- Inclusion of all-day trip rates for all land uses (not just residential).

Table 4 of the updated Transport Assessment (TA) now includes forecasts for Active Travel trips based on TRICS data. This is welcomed. However, ATE requested that the applicant provide an analysis of all-day trips rather than only peak-hour trips within the TA. As many trips are unrelated to commuting, it is essential that an all-day analysis is undertaken. It is noted, however, that TRICS data has been provided throughout the day in Appendix F. This data indicates more than 70 cycle trips and approximately 550 pedestrian trips, significantly higher than those reported in the TA. It will therefore be important to ensure that opportunities exist to support and encourage these modes as part of the development proposals.

Provision of trip rate data for other on-site uses is also welcomed.

• Travel Plan:

ATE requested the following:

- Inclusion of targets for active modes.
- Adoption of a vision-led approach using alternative data to set ambitious, forward-looking targets.

It is disappointing that the applicant has not provided figures for annual monitoring targets or for an increase in active travel. A 15% reduction in private vehicle trips is welcomed, and it is noted that this has been recommended by the Highway Authority. However, it is unclear how this 15% reduction will be reallocated among other modes. Notwithstanding

this, the applicant has identified various active travel improvements that will help to support this reduction. A planning condition has been suggested should the Local Planning Authority (LPA) be minded to approve the proposals.

2. Active Travel Route Audit

ATE requested that the applicant undertake a more detailed Active Travel Route Audit, including an assessment of key routes from the site to surrounding destinations. The applicant has now undertaken a detailed assessment, including maps and photo analysis. The applicant has also applied the principles within the ATE Route Audit Tool and the Cycling Level of Service (CLOs), reflecting the core principles of LTN 1/20. Overall, it is considered that this assessment is sufficient and this matter has been addressed.

3. Accessibility

In general, it was considered that the site has reasonable levels of accessibility to surrounding services and the potential to be sustainable for the purposes of active travel. However, the distance to the nearest bus stop was identified as exceeding the recommended standard (440m). It is understood that the applicant now proposes to provide bus stops and shelters on site, together with real-time bus information where appropriate. This matter is therefore accepted, subject to securing sufficient funding to the satisfaction of the Highway Authority.

4. Off-Site Infrastructure Improvements

ATE does not wish to raise any further concerns regarding site access via Links Way and Durrants Drive.

New shared footway/cycleway:

ATE does not generally support shared-use paths except in limited circumstances set out in LTN 1/20. The applicant has sought to justify the proposed shared footway/cycleway on the basis of anticipated pedestrian flows of fewer than 300 per hour. However, this misinterprets the guidance and overlooks the fact that shared use is only acceptable in specific situations, as listed in LTN 1/20 paragraph 6.5.6, none of which apply in this case.

The assertion that pavement parking will not be an issue because properties along the route have adequate off-street parking is not considered justified. Pavement parking is clearly evident in Google Street View imagery dating back to 2008. Without a Traffic Regulation Order, it seems unlikely that the applicant will be able to resolve this issue.

A facility incorporating a physical buffer between the carriageway and the shared-use path, together with provision for driveway access, would effectively mitigate the risk of pavement parking. This could include physical build-outs to formalise parking bays, replacing the current unrestricted arrangement. Notwithstanding these points, the principle is accepted, and it is considered that this matter can be addressed through detailed design. The proposed facility may offer some utility for less experienced cyclists and children, while on-carriageway cycling is feasible on lightly trafficked streets where vehicle speeds are low.

See build-out examples and buffer examples. Also see '*Streets for All*' within *Building for a Healthy Life* for detailed design guidance.

PRoW Upgrades:

ATE identified the following:

- Improve Footpath 17 and PRoWs 63 and 18.
- Coordinate with the PRoW/Highway Authority regarding contributions.

ATE welcomes the intention to upgrade PRoWs, while noting their limitations as reliable year-round routes for all users. The review of the LCWIP is also welcomed, alongside a commitment to contribute towards the interventions outlined within the plan.

5. Permeability and Placemaking

ATE does not wish to make any further comments on this matter at this stage and is generally content with the design approach.

6. Cycle Parking

ATE does not wish to make further comments on this matter.

3.0 Recommended Planning Conditions

Condition: Travel Plan
submit

Condition: Prior to occupation or use commenced, evidence that the pre-occupation elements of the approved Travel Plan have been put in place shall be prepared, submitted to and approved in writing by the Local Planning Authority. The developer shall then enable the Highways Authority to implement, monitor and review the approved Travel Plan to the satisfaction of Local Planning Authority unless agreed in writing by the Local Planning Authority.

Reason: To support sustainable transport objectives including a reduction in private vehicular journeys and the increased use of public transport, walking, wheeling and cycling.

Condition: Infrastructure

Condition: No development shall commence until general arrangement plan(s) to a scale of 1:200 showing details of the walking / cycling infrastructure including works to the adopted highway have been submitted to and approved in writing by the Local Planning Authority. The details shall be submitted in accordance with guidance contained in LTN 1/20 on Cycle Infrastructure Design and

Manual for Streets and where applicable indicate proposals for:

- Existing levels of the finished highway tying into building threshold levels
- Alterations to waiting restrictions or other Traffic Regulation Orders to enable the works
- Signing, street furniture, street trees and pits
- Structures on or adjacent to the highway
- Extent of any stopping up, diversion or dedication of new highway (including all public rights of way shown on the definitive map and statement)

The development or any phase of the development, whichever is the sooner, shall not be occupied until the walking and cycling infrastructure for the development or phase of development has been constructed and completed in accordance with the approved details.

Reason: To comply with CP10: Transport and Travel of the Three Rivers Local Development Framework Core Strategy Development Plan Document (DPD) 2011 and the guidance in LTN 1/20 on Cycle Infrastructure Design and in Manual for Streets.

4.0 Next Steps

ATE requests that the Local Planning Authority share this response with the applicant's agent.