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Your Ref: WNN/2023/0083
Our Ref: ATE/23/00217/OUT
Date: 26 July 2023

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

From: Planning & Development Division, Active Travel England

To: Development Management, West Northamptonshire Council

Application Ref: WNN/2023/0083

Site Address: Northampton Station Car Park, St Andrew's Road, Northampton, NN1 2SD, Northampton, NN1 2SD

Description of development: Hyrbrid (outline) planning application for the redevelopment of land at Northampton Station. Phase 1 – Approval sought for details of all reserved matters for the construction of a multi-storey car park and public realm works including; access road, footway, cycle ways, covered walkway, covered parking hub, motorcycle parking, accessible parking spaces, taxi waiting areas, turning areas, street furniture, vehicular set down/ pick-up point and bin storage. Phase 2 – Approval sought for details of; means of access, scale and layout for the construction of a six storey residential block to accommodate a maximum of 280 units and approval details for means of access, scale and layout for the construction of a five storey hotel comprising a maximum of 100 rooms, associated ancillary accommodation, restaurant and associated parking and turning areas. Details of landscaping and appearance of Phase 2 buildings reserved for subsequent approval.

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

ATE welcomes the opportunity to comment on these proposals for the redevelopment of existing land at Northampton Railway Station. Full permission is sought for access, public realm works, parking, and set down / pick up facilities for those travelling to and from the station (phase 1) while outline consent (access, scale and layout) is sought for the construction of a 280-unit apartment block and a 100-room hotel.

The scope and objectives of the proposals aim to create an integrated transport hub with improved facilities for rail passengers arriving and departing the station by a range of different modes whilst unlocking potential to deliver high density new homes, the enhancement of public realm around the station and the creation of a new gateway to the town.

The Northampton Local Plan (NLP, March 2023) identifies this site (LAA0288) and its neighbouring site to the north (LAA0333) for redevelopment through the preparation of a comprehensive masterplan. With specific reference to active travel, the NLP expects the above sites to *"secure permeability within the site for pedestrians and cyclists",* and deliver *"improved and safe connectivity, including direct pedestrian routes, with the Spring Boroughs area, and improve the relationship between the site and the town centre".*

2.0 Summary

ATE supports the intention to consider these sites and their internal components holistically in a way that maximises opportunities for active and sustainable travel in a location that is close to both the town centre (10 minutes' walk) and the national rail network.

The recommendations below identify several issues that require further consideration and enhancements which ATE consider are necessary in order to meet current national policy to make walking, wheeling and cycling the first natural choice for local journeys, taking into account the safety of pedestrians and cyclists, together with the attractiveness of the routes connecting the site to the wider area.

ATE has considered the submitted masterplan and reconfigured access arrangements, together with the quality of the walking, wheeling and cycling network between the site and the surrounding area alongside national policy and guidance, with specific reference to the following spatial planning policies and design requirements.

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.

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.

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.

LTN1/20 (Cycle Infrastructure Design) sets out the expectations for providing cycling routes and facilities at transport interchanges as follows:

4.2.12 Cycle routes remote from roads may have other risks relating to crime and personal security. The risk of crime can be reduced through the removal of hiding places along a route, by providing frequent access points, by providing lighting, and by passive surveillance from overlooking buildings and other users.

11.6.1 Cycling increases the reach of public transport services, and the combination of cycling and public transport helps people to make journeys that are too long to cycle. Cycling generally provides reliable journey times between the home and station, little affected by peak time traffic congestion. A high proportion of the UK population lives within 2 miles of a railway station.

11.6.2 Cycle hubs are generally the most appropriate form of cycle parking at public transport stations (see 11.4.12). At smaller, unstaffed stations or tram stops, the absence of passive surveillance will be of concern to users who will need to leave their cycle locked up for prolonged periods. Even at busier stations this may be a concern. The chosen location should be covered by CCTV.

4.0 Opportunities

Through the submission of a comprehensive masterplan for the site, this application provides a valuable opportunity and therefore responsibility to improve the environment within the station site as well as its linkage to the wider area by all modes. This is especially important if the site is to increase its capacity and attractiveness for rail users and effectively future-proof an integrated and inclusive transport hub and gateway to the town, whilst serving a new population that will need to feel integral to, and not isolated from their surrounding area and local facilities.

At present the site offers very little in the way of safe and attractive permeability for pedestrians and cyclists. Whilst the construction of a new station building in 2014/15 has improved the frontage of the site to the A4500 Black Lion Hill, conflict between pedestrians and cyclists remains along the shared footway in this location and further along St Peter's Way to the east and St James' Road to the west along what is a key multi-modal linkage to the town centre. These proposals, alongside adjacent growth provide a realistic opportunity to address some of these matters in relation to the scale and prominence of the applications proposed.

The submitted application will generate a material intensification in movement in and around the site resulting from the increased car parking, anticipated increases in rail patronage, a 100-bedroom hotel and up to c.600 new residents. The submitted Design & Access Statement (DAS) (p38) acknowledges a number of concerns raised by the local community around the accessibility of the site and pedestrian and cycle connectivity to the wider area by active and sustainable transport. From reviewing the proposals and in consideration of the surrounding area the following deficiencies are apparent on the surrounding active travel network, which need to be considered in further dialogue between planning officers, transport / highways colleagues and the applicant.

These considerations are crucial if the development is to meet the objectives set out on page 4 of the DAS and the policy criteria set out in the NPPF to deliver an accessible and inclusive environment.

5.0 Areas of Concern

Wider connectivity

The Northampton Local Walking and Cycling Infrastructure Plan (LCWIP) is understood to be under review following initial consultation and the release of LTN1/20 with further public consultation expected this year. Comments raised during previous engagement for the LCWIP reflect the above analysis of the surrounding area, highlighting safety issues at the existing vehicular access to the station (for cyclists turning into it) whilst also identifying the lack of safe infrastructure within the site in addition to the lack of protection along St Andrews Road.

Elsewhere, comments submitted included: a shortfall in secure cycle parking at the station; pinchpoints near to the station entrance; a lack of safe and segregated cycling infrastructure along the A4500 Black Lion Hill / St James' Road / St Peter's Way; and conflict between pedestrians and cyclists on the designated shared footpaths that run along this route. Further issues of conflict are identified on the most direct route into the town centre along Mare Fair and Gold Street where access restrictions prevent use by general traffic with the exception of buses and delivery vehicles.

St Andrews Road

A number of physical and topographical constraints hinder the permeability of this area, including the River Nene (to the west), the existing railway sidings (north), and the A5095 St Andrews Road which defines the site's eastern boundary by way of a retaining wall, reinforcing the physical barrier between the station and the residential area of Spring Boroughs to the east, itself enclosed by a high wall. Consequently, the environment for non-motorised users along St Andrews Road is largely unwelcoming and unlikely to encourage increased use by pedestrians, cyclists or mobility scooters from the considerable residential catchments to the north and east of the station.

Access ramp to Black Lion Hill

The full application proposes to construct an access ramp from the A4500 Black Lion Hill. Notwithstanding the issues of conflict on this shared footway / cycleway, the gradients (and lengths of gradient) would not appear to meet the requirements of Inclusive Mobility, given that there are long sections with a 1:12 gradient and with limited resting 'plateaux' within a width of 1800mm accompanied by railings on each side and with right-angled turns. Whilst the intention to improve access from this direction is supported, further justification is required of this design in view of the above departures from expected requirements.

Access to the site (Full application)

St Andrew's Road access

The existing vehicular access to the station and its car park provides a narrow footway varying in width between 1.5m and 1.8m alongside this access, the specification and quality of this route (in terms of widths, crossings, directness) falling considerably below expected requirements for safe and attractive access by foot, bicycle, pushchairs and mobility scooters.

This access to St Andrew's Road is proposed to be retained with some minor improvements at the junction bellmouth (as shown in Hydrock dwg: *16690-HYD-XX-XX-DR-TP-0012*) comprising a suggested widened 3m shared footway / cycleway at the northern radius, which is proposed to continue into the site for approximately 110m where it meets the new segregated cycle link which in turn continues west. Whilst this constitutes an improvement to the existing situation, cyclists would need to turn into and from this facility very sharply (at a 90 degree angle) and this requires to be addressed and redesigned in consideration of the required minimum radii as prescribed in chapter 5 of LTN 1/20.

Proposed Internal access layout

The pedestrian route into the site is intended to continue alongside the access road at a width shown of 2.3m, which appears to represent a widening from the existing path, although this narrows to 1.9m further to the south. Along this route pedestrians will be required to give way to vehicular traffic at a number of locations, including where taxis enter and exit the holding area. It is recommended that this priority is reversed in favour of pedestrians and users of mobility vehicles by way of a continuous footway. Further to this, it is unclear and therefore questioned how cyclists are intended to access the residential and hotel uses along this route in a way that is safe and in avoidance of conflict with pedestrians and motorists.

The proposed clockwise one-way route proposed appears sensible as it minimises carriageway widths, although the frontage to the proposed residential development would benefit from a greater area of public realm. This could be achieved in the event that both the proposed access and egress to the car park were provided from the existing access road to the east and not from a two-way section of road directly in front of the residential block. This would allow for the connection from the taxi-rank to the existing access road to be one-way and therefore narrower, maximising the extent of public realm in front of the residential site.

Cycle routing (Full application)

Segregated cycle route

A new segregated cycle route is proposed to connect the existing access on St Andrew's Road in the north east of the site, heading west alongside the proposed multi-storey car park before continuing south and parallel with the rail line to access the above cycle hub close to the station entrance. A 3m width is provided for this facility (1.5m in each direction) and this is considered suitable (in accordance with LTN 1/20 Table 5-2) where two-way cycle flows are unlikely to exceed 1,000 during the peak hour.

The principle of a segregated cycle facility within the site is supported and will remove a number of existing conflicts for cyclists approaching from the north of the site, but not wholly, given that the segregated route terminates at the main vehicular access where cyclists are then required to share space with pedestrians and ultimately traffic on St Andrew's Road. Further conflicts are apparent near the station building, which is considered later.

Security and Surveillance

The rationale underpinning the routing of the new cycling facility is understood, although by skirting the periphery of the site, this route will not benefit from the natural surveillance that it should have (and possibly for some time) in line with LTN 1/20 paragraph 4.2.12.

Depending on the speed of delivery of NLP allocation site LAA0333, this may be a short-term issue, but alternatively it may not. This matter requires to be acknowledged and addressed in the short term through ensuring adequate lighting and CCTV, but in the longer-term through the sensible masterplanning and orientation of built form within NLP LAA0333 that it actively fronts onto and provides a number of accesses to this route (instead of the single location shown) to prevent it becoming positioned between a multi-storey car park and a hard boundary, creating an inhospitable route and raising concerns around security.

Public Realm in front of station (Full Application)

Further to this, it is reasonable to expect and potentially to be encouraged that cyclists who are not undertaking rail journeys may use the new segregated route as a safer alternative to St Andrews Road, particularly from NLP LAA0333. The design therefore needs to be considered carefully, with particular attention paid to any points of conflict or pinchpoints. It is also feasible (and therefore enquired) whether there is a wider intention for this route to provide linkage from the A4500 to the northern suburbs of Northampton, which would again increase its use and significance.

The route for cyclists is proposed to continue around the station forecourt and building to meet the shared footway / cycleway on the A4500 Black Lion Hill. Given the problems that occur in this location at present and which are likely to be exacerbated in the future by

increased movement, the opportunity to address the current pinchpoint between the station and the proposed hotel (submitted as outline) and its boundary wall needs to be exploited and therefore must be addressed at the outline stage, rather than being postponed until reserved matters for the hotel, at which point the principles and parameters for access are set and too late to address.

The DAS (p38) indicates that the pinch point has been reviewed with a proposal to amend the retaining wall, but drawings indicating this do not appear to be available at the time of writing.

Pick up and Drop off facilities (Full Application)

Taxi pick-up and drop-off facilities

ATE supports the provision of specific taxi provision, although the issue of potential conflict between taxis dropping off and picking up in the same area causes issues at many stations. It would be better to separate these movements and have the taxi drop-off alongside the covered walkway and the taxi pick up alongside the frontage to the hotel (with accompanying shelter for those waiting). This arrangement would also prevent alighting taxis 'jumping the queue' to pick up new passengers ahead of those waiting in the holding area.

With regards the holding area it would be useful to understand how this would be managed to ensure that taxi drivers held in this area know when to proceed to the pick up to avoid the latter becoming over-subscribed with vehicles and generating conflicts within the access road or picking up from unspecified areas.

Private vehicle drop-off, deliveries and rail replacement buses (detailed)

Due to the clockwise arrangement of the internal access road and the location of the public drop-off bays to the east of it, front-seat passengers alighting private vehicles will be opening car doors and departing into live traffic. It is suggested therefore that the public drop-off and the taxi rank are switched, given that the majority of taxis passengers sit to the rear of the cab and are therefore able to alight via either side of the vehicle.

Multi-storey Car Park (Full Application)

The proposals seek detailed permission for the construction of a multi-storey car park to accommodate 1,200 car parking spaces, representing an increase of 369 spaces from the existing provision of 831. This figure is justified in the submitted Transport Assessment (TA) on the basis of predicted demand over the next ten years, which goes onto forecast that this facility alone would result in an additional 738 vehicle movements per day, with the busiest hourly period attracting an additional 143 movements. This represents a 15% increase in the daily movements associated with car parking at the station and a 46% increase in car park related traffic movements during the busiest peak hour (17:00-18:00).

Covered walkway from MSCP to station building (full application)

ATE supports the principle of a covered walkway, which will providing shelter from the elements for those accessing the station to / from the car park and a width of 3.9m is provided for this route. There is some concern that this will lead to a potential for conflict between pedestrians walking to / from the car park and rail passengers with luggage waiting for, boarding and alighting taxis. The management of this area is therefore something which requires to be carefully considered as part of the overall station

management plan (during and post-construction), and for which it is suggested that a specifically worded pre-commencement condition is applied to secure this.

Cycle Parking (Full application)

The proposed cycle hub is located in close proximity to the station building. This location is supported, in view of the convenience this will provide for cyclists to walk between this facility and the station entrance in line with LTN1/20 paragraph 11.2.4. The total number of spaces provided is 258, representing an increase of 218 spaces when compared to the exiting provision which comprises 20 Sheffield stands (40 spaces).

The figure of 258 has been informed by Network Rail, as stated in paragraph 8.2.9 of the TA, although ATE requests how this figure has been arrived at, what relevance it has to any station Travel Plan, any existing / forecasted mode share information or future projections or targets for increased use or future-proofing.

The nature of the cycle parking proposed is not supported. The specification shown in the submitted documentation is not likely to sufficiently protect cycles (or cyclists) from becoming wet, nor does it present a welcoming or attractive environment to store a bicycle. ATE is mindful of comments made by highway officers and the example suggested at Kettering Station, which has been reviewed and for which ATE concurs is a far more suitable and attractive option. Another example of high-quality facilities are present at Cambridge North railway station.

ATE therefore requires that this part of the masterplan is redesigned to take account of the above, and to incorporate facilities akin to a 21st century facility in accordance with the following sections of LTN 1/20 to include space for larger mobility and cargo bikes (Figure 11.2), tyre pumps and tools (Figure 11.9), CCTV and 100% covered facilities (11.2.4), a secure hub to allow for bikes to be locked away (11.6), alongside an exploration of the potential to operate a cycle hire or Brompton dock to enable rail users and/visitors to Northampton to continue their journey by bike, minimising the impact of movement upon local highway and public transport networks.

Outline application - Residential and Hotel Development

<u>Principle</u>

ATE has considered the location of the proposed residential development. Attention is therefore paid to the level (and quality) of access to local facilities in the interests of evaluating the potential reliance that will likely be placed upon the active travel network surrounding the site. Table 4.1 of the submitted TA identifies a range of facilities within a reasonable walking distance of the site including public transport, retail, education, healthcare and leisure uses, including a local park. ATE concurs with the findings of the TA that residential development in this location has the potential to encourage and embed active and sustainable travel behaviours in view of the range of facilities located within a 10-minute (800m) walking distance. This is helpfully illustrated in TA Appendix A through use of isochrones.

<u>Access to surrounding area</u>

These assumptions can only however be substantiated where the local walking and cycling network is of a standard that is safe and will encourage these movements and built to a specification that is attractive to all members of the community. Whilst sections 4.2 and 4.3 of the TA provide a description of local walking and cycling infrastructure surrounding the site, this is purely descriptive, for instance in relation to St Andrew's Road,

which whilst confirming 2 metre footways on each side neglects to consider the high boundary walls which run along both sides of this road for much of its length, reducing the usable width to 1.5m whilst negatively influencing driver behaviour and perception of personal security as a result of the lack of active frontage on each side.

This is not considered to be a welcoming environment for pedestrians and cyclists and requires to be addressed in view of the extent of growth expected on this and the neighbouring site to the north and given the areas it serves further north including Semilong and Kingsthorpe, Queen's Park and Sunnyside, each of which are within a reasonable cycling distance of the site, as helpfully identified in the isochrone at TA Appendix B.

In terms of surrounding cycling infrastructure, reference is made to the shared facilities along the A4500, which comprises part of National Cycle Network (NCN) Route 6. However, as a route that is shared with pedestrians, these facilities do not meet the standards required to embed and realise a considerable increase in cycling necessary to support such a key route into a major town and its transport hub.

Direct access to outline application elements

It should also be noted (and therefore rectified in the masterplan) that neither the pedestrian nor cyclist routes to the station appear to provide safe or direct access to the new residential or hotel sites from the north and east. If this is to be addressed by the subsequent reserved matters applications a condition is therefore required that considers this in the context of the proposed access to these new buildings prior to the submission of reserved matters. This is crucial given that these development sites appear isolated and surrounded on all sides by vehicular routes - some planting and public realm is proposed but ideally these matters require to be considered at same time as the infrastructure to serve these sites is being determined.

6.0 Next Steps

ATE recommends that these comments are forwarded to highway officers, the agent and the applicant with further consideration required to address the following key points that are summarised below.

1) St Andrew's Road - Whilst the ability to undertake meaningful improvements to this route appears limited due to constrained widths and retaining walls, it is suggested that some of the issues could be addressed by the removal of one of the footways, save for a 500mm buffer strip to enable a single improved and widened shared use footway / cycleway of around 3m to be constructed on one side (with appropriate and safe crossing facilities to be provided where necessary). This would fit with the expectations of the Local Plan to better connect the station site, the two allocations that sit alongside it, the town centre and the Spring Boroughs area to the east. Should the LPA consider this to be feasible, a financial contribution from the development would appear the most sensible option to allow the development to progress.

2) A4500 Black Lion Hill / St Peter's Way / St James' Road - Whilst the issues that occur in these locations appear to be existing problems in relation to pedestrian / cyclist conflict, the increase in movements brought about by this development and further expansion of rail connectivity and surrounding growth will ultimately place additional pressure on facilities that - if ambitions for modal shift are realised - are likely to remain as substandard when assessed against LTN 1/20. Further consideration is required of this route in conjunction with the local authority to consider: future movement patterns and

behaviours; the need for segregated cycling facilities; a safe and accessible access ramp, and how this development may reasonably and proportionately contribute towards these improvements.

3) Internal Access - Access for pedestrians and cyclists together with desire lines is likely to result in a pinchpoints at the vehicular access to St Andrew's Road and in front of the station building where facilities are shared. Within the site, the design considers footway users subservient to vehicular traffic in some locations, whilst direct pedestrian and cyclist access to the residential and hotel site appears to have been overlooked. These matters require to be addressed. A further concern is raised over the quality of the environment for future residents where the proposed access / egress to the car park is situated and a solution is proposed that will remove circulating traffic from this location whilst allowing a for a greater extent of public realm.

4) Cycle route - A number of issues present with regard to the cycle route. The proposed alignment and positioning risks an unwelcoming and unsafe environment in the event that these proposals (and surrounding developments) fail to deliver lighting, CCTV, and natural surveillance. In the vicinity of the station building entrance, the proposed layout appears to retain the existing bottleneck, which will add to conflicts, particularly in the case of increased use. Improved masterplanning of the proposed hotel site and its retaining boundary wall is required to address this at the outline application stage. At the northern end of the site, cyclists will be required to undertake a sharp turn to enter / exit the segregated cycling facility.

5) Internal pick-up and drop off conflict - ATE welcomes the provision of dedicated facilities for all users, including pedestrians and those arriving by taxi and private drop off. However, concerns are raised regarding: personal drop-offs occurring into 'live' carriageway; conflict between taxis arriving and discharging passengers as taxis are picking up passengers and attempting to depart; obstruction to the 3.9m pedestrian route by passengers and luggage awaiting taxis and the communication of capacity to taxis waiting in the holding area. Whilst a management plan will be necessary, the separation of taxi drop-offs and taxi pick-ups, together with relocating the personal pick-up / drop-offs area may address this.

6) Cycle Parking - The location of cycle parking is supported, although the specification requires to be addressed alongside justification of the numbers proposed, together with an upgraded facility from what is proposed to meet modern expectations with regards to security, the size of bicycles able to use the facility and the overall attractiveness of the provision. A substantial investment is being made to upgrade the experience for passengers arriving at the station by car and this experience should be equalled (and arguably surpassed by) the experience of cyclists if the site is to actively encourage and promote access by bike.

7) Access to outline elements (residential / hotel) - The constraints, safety issues and issues of public realm that surround these sites need to be properly considered in the context of the adjoining full application, which seeks permission for the access for the wider site and insodoing considers the masterplan as a whole. Where barriers to movement exist (as in the case of the pinchpoint near the station building) these require to be addressed holistically to avoid precluding better placemaking at a later date. Further information is required in relation to the positioning (or repositioning) of the existing boundary wall to the hotel site.