



Active
Travel
England

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Your Ref: WNN/2023/0083
Our Ref: ATE/23/00217/OUT
Date: 18 December 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: Hybrid (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

Active Travel England (ATE) welcomes further information in support of the hybrid application for the redevelopment of land at Northampton Railway Station to include improved passenger facilities together with the construction of a hotel (100 rooms) and a 280-unit residential apartment block.

Previous comments were submitted by ATE on 26th July, which raised the following concerns and requests for further information in respect of addressing the existing barriers to active travel which can be split broadly into three categories:

- **Wider connectivity** - accessibility and safety of St Andrew's Road (SAR) and Black Lion Hill (BLH), including: the suitability for walking and cycling along SAR to the north; the proposed access ramp into the site from the south and shared space conflict along BLH;
- **Internal Layout** - addressing the widths and sharp turning radii allocated to cyclists close to the access from St Andrew's Road; the widths and priority given to pedestrians where footways cross vehicular entrances; the safety and security of the cycle route from the west and the lack of active frontage; the creation of an undesirable pinchpoint in front of the main station entrance close to BLH; taxi pick-up / drop-off arrangements; safety of drop-off passengers; safety of access to residential / hotel uses by bicycle
- **Internal Facilities** - the type of cycle parking provision proposed does not protect cycles (or users) from elements, does not allow for parking by all sizes of bikes and does not represent best practice / modern standards for a new facility.

2.0 Summary

ATE is in receipt of a Technical Note (TN) prepared by Hydrock consultants that has been submitted in response to the above matters and other matters raised by National Highways and WNC. Within the introduction (parag 1.1.2) it is argued that the proposed development:

"do(es) not create the increased rail passenger demand that is forecast in the coming years, and so the scale of any mitigation / contribution needs to be proportional to the development of 280 dwellings and a 100-bedroom hotel".

This is a quite extraordinary statement. Aside from arguing that the application and its surroundings should not be future-proofed against increased demand, and notwithstanding the impacts of the hotel and residential accommodation which are significant in their own right and demand to be served by high quality accessible and inclusive routes, this sentiment would appear in direct contradiction to the project's own objectives set out in section 1.2 of the applicant's Design and Access Statement, which are to:

- ***Develop the current site into a more integrated transport hub***
- ***Allow more people to access the rail network at Northampton by providing sufficient car parking provision to meet the demand to provide 1,214 (369 additional) spaces***
- ***Improve new customer drop off facilities that will be integrated into a public realm scheme***
- ***Create a new Gateway into Northampton***

This is furthered in section 1.5 of the same document, which continues thus:

"The plans will see a new multi-storey car park constructed in the first phase of development, providing additional parking capacity at the station to cater for an increase in passenger numbers."

While accepting and expecting an increased level of rail passengers at the station and creating the conditions for greater levels of vehicular traffic to access and egress the site, the document considers that it is not this planning application's responsibility to consider or cater for the needs of rail passengers accessing the station from any location other than within the site itself, arguing the (edge of) town centre location to be a 'catch-all' for a blanket assumption of existing high quality accessibility, despite the accessibility barriers and problems that exist in the local area.

On this basis, it therefore follows that when an increase in rail passengers arises - whether arriving by car or other means - and causes additional demand and problems on local networks (in addition to that of the new hotel and residential uses), it will be for others to address those deficiencies. ATE therefore cannot support these proposals in their current format.

3.0 National Policy and Guidance

The applicant is reminded of the following expectations of the National Planning Policy Framework (NPPF):

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;

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...;

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.

A key expectation of Gear Change is to ensure the delivery of cycling infrastructure in accordance with the following principles:

- *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*

4.0 Opportunities

As per the sentiments expressed above, it is disappointing that only the infrastructure within the red line boundary of the site has been considered by this application. Opportunities to exploit and benefit from improved high quality facilities for walking, wheeling and cycling by new residents and hotel guests as well as rail passengers have not been taken up around the periphery of the site in line with government policy in a way that will benefit and encourage and embed active travel.

The applicant has however responded positively to a number of on-site issues as follows:

- Footway Crossovers / tactile paving - The provision of footway crossovers and tactile paving at a number of locations around the site is supported to maintain priority, and visual / physical cues for vulnerable users. It is suggested that vertical deflection through speed humps are included, particularly where 'zebra' crossing points are located on the access road (close to the car park exit) and adjacent to the pick-up / drop-off areas to further emphasise priority.
- Segregated Cycle Route CCTV & Lighting - While the need for CCTV should ideally be designed out through active frontage and surveillance, this will be fairly unavoidable along what will be a fairly 'blank' northern boundary of the car park. The provision of lighting and CCTV is welcomed, although a key requirement for the LPA when determining the adjacent site will be to provide activity and surveillance over this route if it is to be a) safe and b) used.
- Continuation of cycle route across main entrance - the applicant has responded to the suggestions to continue the segregated cycle route across the station building frontage, although concerns remain of how pedestrians / cyclists interact directly to

the south of this and along Black Lion Hill, where infrastructure doesn't meet requirements of LTN 1/20 or Gear Change referenced earlier. Further detailed drawings are required in this location, where the cycle route abuts a wall and appears to stop abruptly. Comparing the TN drawing with the original masterplan suggests that the applicant has not addressed the issue of the retaining wall that forms the boundary of the hotel proposals despite it being within the gift of the application. This is a significant missed opportunity to address what is and will continue to be a pinch point.

5.0 Areas of Concern

Overspill Parking

The development site is not located within the town centre, nor is it located within a permit parking zone, as per comments made by WNC. ATE concurs with the view that restricted parking numbers on-site does not equate to low car use or ownership or demand for parking off-site. Further, and outside of the control of planning, ATE is not aware of any controls being suggested to prevent hotel visitors or permanent residents renting or leasing spaces within the car park that is the subject of this application. Were it likely or probable that existing on-street spaces were convenient to future residents of this site, it would be recommended that WNC obtains a contribution to undertake consultation with surrounding areas to determine the feasibility (and likely acceptance) of time-controlled or permit parking restraint measures.

St Andrews Road Access

Adjustments to the access to St Andrews Road are included within Appendix B of the Technical Note. ATE has reviewed this drawing and highlights the following critical issues:

- The exit from the station cycle route (on the 3m shared footpath) distributes cyclists into the carriageway without warning to either cyclists or motorists and in the absence of any facilities on the carriageway to safely accommodate cyclists. This will not encourage cycling to or from the site, contrary to the aims of the development and given the deficiencies already highlighted on St Andrews Road in ATE's previous response.
- Simultaneously, to enter the station site from the north, cyclists are required to compete with and share space with traffic to access a right-turn lane to enter the station. However, some would be turning into the footway, while others may opt to use the road access which will cause confusion for motorists turning left out of the access. This design also assumes that there are no pedestrians in the area (who will likewise have no ability to cross St. Andrews Road safely at this junction) and therefore conflicts will be created between cyclists and pedestrians using the footway inside (and outside of) the station, while pedestrians who access the station from the north will continue to be subject to deficient footway widths and an absence of crossing facilities. The current design is a far from satisfactory or inclusive outcome for non-motorised users.

St Andrew's Road Access – potential solution

- This is not a safe environment for pedestrians or cyclists which will become exacerbated by the additional movement demands placed on it, whether through increased passengers, car-borne trips to the site or both. Furthermore, the design encourages conflict between pedestrians and two-way cyclists in a location that is around 2m beneath the required width when assessed against LTN 1/20 chapter 5.
- It is suggested that the applicant considers the provision of pedestrian refuge crossings at either end of the ghost-island right-turn lane (as proposed at the station access arm), with appropriate footway widening, lighting and signage accompanied by footway widening on St Andrew's Road to accommodate additional width. Further to the north, the necessity of the right-turn lane into Scarlettwell Street should also be considered.
- Further to the above and referencing the applicant's PICADY junction assessment of the junction, for which the results are presented at Table 1 of the TN, there appears no justification for providing two entry lanes where the access meets St Andrew's Road in any of the 2031 peak hour scenarios tested, with no queue greater than 3 vehicles. The additional space afforded by the removal of an entry lane could usefully contribute to a much-improved environment for pedestrians and cyclists in line with current planning policy and design guidance, although the needs of larger vehicles are noted.
- Whether these improvements are conditional upon this development (and delivered through s278) or form a financial contribution towards wider improvements to be promoted by WNC is a matter for the LPA in conversation with transport / highways colleagues and the applicant. Given the applicant's apparent willingness to engage with and listen to the local community (as demonstrated on p38 of the DAS), attention is drawn towards comments made as part of the [Safer Streets Northamptonshire](#) project with specific reference to this location.

Internal Cycle Route

- The applicant is once again required to refer to the requirements set out in LTN1/20 to address the abrupt right-angle turn cyclists would be required to make (and in direct conflict with pedestrians to the north-east corner of the new car park). This does not comply with any guidance on cycling routes either prior or subsequent to the adoption of the above document.

Station Cycle Parking

- ATE repeats the concerns raised in its original response in respect of the proposed cycle parking provision failing in its intention to provide an attractive, safe and secure facility that is inclusive to all users. Given the investment being made to attract motorised users to the site, the quality of provision for cyclists should be at least equal, if not better in line with government planning policies to promote and prioritise active modes of travel and chapter 11 of LTN1/20. ATE questions whether the 'operational needs' of London Northeastern Railway (which operates as a franchise) demonstrates a commitment to increase cycling to stations and by what percentage, and requests to see how it intends to achieve this. The provision of semi-covered spaces will most likely result in this facility being underused, which would merely justify continued underinvestment in active travel.

Access from Black Lion Hill

- The extension of the segregated route to Black Lion Hill represents a partial improvement, but, similar to the access to St Andrew's Road distributes cyclists, pedestrians, wheelchair and mobility scooters into direct conflict at the station entrance, where an adjustment to the existing boundary wall with the hotel site would alleviate this situation considerably, whereas no provision (or funding), is offered to address existing conflict and deficiencies in the surrounding area.
- The TN continues to argue that the planning application will not lead to a material increase in movement demands that would warrant investment in the surrounding area, despite proposing an additional 369 car parking spaces (738 vehicle movements per day), 100 hotel rooms (up to 300 multi-modal movements per day) and between 500-600 new residents, which would generate between 800 and 1,200 movements each day alone. The TN argues the site to be *"well-placed for walking and cycling trips into Northampton itself"* and that it is *"ideally located, for car-free development, as proposed for both the hotel and residential elements"*.
- Setting aside the additional station parking, the TN continues to overlook the needs of new residents and rail passengers by challenging the prospect of any off-site improvements in an area of known and demonstrable deficiencies identified in ATE's previous response. The applicant appears to argue both ways - on the one hand it argues the site to generate minimal / negligible levels of additional motorised travel on the basis of the site's sustainability while elsewhere in the same report arguing the level of walking and cycling trips to be minimal but promoting the location in respect of encouraging and realising a shift to active travel.
- The applicant is once again reminded of the Northampton Local Plan (NLP, March 2023) which identifies this site (LAA0288) and its neighbouring site to the north (LAA0333) to 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"*. At present the application fails on both these counts.
- The TN makes reference to the implementation of the access ramp to Black Lion Hill. While this is sound in principle, no changes have been made, despite the gradients (and lengths of gradient) failing 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. As before, further justification is required of this design in view of the above departures from expected requirements.

Taxi / General Traffic drop-off / pick-up

- Concerns are repeated in respect of the arrangement of taxi and private vehicle drop-offs / pick-ups. Private vehicles, if dropping off on the eastern side of the access road are likely to discharge more passengers to their nearside and into the path of oncoming vehicles. While speeds will be low, this still presents obstruction, inconvenience and hazards. Similarly, it would prove more efficient and sensible for taxis to discharge (and pick up from this area), given taxi passengers are more likely to board / alight from the offside. While a matter for internal management, this continues to risk repeating conflicts experienced at other stations.

6.0 Next Steps

ATE is happy for the above recommendations to be shared with the applicant and its agents as appropriate. Following this it will be necessary to enter into further discussions to resolve outstanding matters through further amendments to the design (as referenced above), taking account of the need for the delivery and/or funding of off-site enhancements and contributions in line with current policy and design requirements.