

East Lancashire Paper Mill, Radcliffe

Response to Active Travel England

Client: Morris Homes

Date: 08 November 2024

Prepared by: RW

Job No 327112

Approved by: ME

1. Introduction

1.1.1 This Technical Note (TN) has been produced by Mode Transport Planning ('Mode'), on behalf of Morris Homes, in relation to a reserved matters application (App Ref : 70284) for 400no. residential dwellings at the former East Lancs Paper Mill (ELPM) site in Radcliffe.

1.1.2 This note (TN03) has been prepared in response to comments received from Active Travel England (ATE), dated 26th January 2024, which are attached in [Appendix A](#).

1.1.3 The comments raised are summarised in the following headings:

- Safety of Access to Cross Lane
- Update on improvements to Rectory Lane
- Internal vehicle speeds and quality of environment
- Accessibility for pedestrians, cyclists and disabled users
- Surface quality of leisure routes
- Cycle Parking
- Travel Plan

1.1.4 This note responds to each of the comments listed above to seek agreement with ATE and enable them to raise no objection to the reserved matters application,

2. Active Travel England's Comments

2.1 Safety of Access to Cross Lane

2.1.1 ATE has stated that there is a *'lack of safe facilities for cyclists at each of the site's junctions with Cross Lane'* and *'it is encouraged that these junction designs are revisited as part of the Section 278 agreement to deliver a LTN1/20-compliant solution in each case'*.

- 2.1.2 It should be noted that LTN 1/20 was published in July 2020 and was therefore not available at the time of the planning submission for the outline application at the site (App Ref : 62969), which was submitted in June 2018 and approved in December 2018. It was therefore not possible for LTN 1/20 to be considered in this instance.
- 2.1.3 The access arrangements on Cross Lane have already been approved by the Local Highway Authority (LHA), Bury Metropolitan Borough Council (BMBC), as part of the outline application (App Ref : 62969).
- 2.1.4 Notwithstanding this approval, there is a network of cycling routes proposed throughout the site, including connections to Church Street East and Bury Street, which provide alternatives to a direct access onto the Cross Lane (A6053) for cyclists wishing to head east. These are shown in Figure 2.1.

Figure 2.1 : Cycle Connections to the Local Highway Network (image source : Morris Homes)



- 2.1.5 Some additional features to support the safe movement of cyclists could be accommodated through the Section 278 technical approval process. These are currently being discussed with BMBC Highways and Transport for Greater Manchester (TfGM). A further update can be provided once these features are agreed.

2.1.6 Internal cycle links will be on-street with modal-filters included at connects to the existing highway. This would remove the need for additional features supporting the change between on-street and off-street cycle routes.

2.2 Update on Improvements to Rectory Lane

2.2.1 Information has been requested by ATE as to whether any works will be delivered along Rectory Lane and how these will be aligned with the delivery of this development.

2.2.2 A new 3m wide shared footway / cycleway will be provided from Rectory Lane to the new bridge to cross the River Irwell to the south which will form part of the Bee Network. This route will connect with the proposed network of pedestrian routes within the site, and carriageways that encourage safe active travel to and from the site onto the local highway network.

2.2.3 The new routes on Rectory Lane are shown in Figure 2.2.

Figure 2.2 : Shared Footways / Cycle Ways from Rectory Lane (source : Morris Homes)



- 2.2.4 It should be noted that as part of the outline application approval, no works to Rectory Lane were conditioned. As part of Condition 43, there is to be no access via Rectory Lane other than for emergency service vehicles, *'there shall be no direct means of vehicular access between the site ... and Rectory Lane'*.
- 2.2.5 The current proposals show an adoptable turning head for vehicles on the site boundary with Rectory Lane, along with a modal-filter, as noted above, in the form of a buildout and bollards. The exact arrangement and type of the restrictions is being discussed with BMBC Highways and TfGM.

2.3 Internal Vehicle Speeds and Quality of Environment

- 2.3.1 ATE has highlighted that, with the exception of private drives, all carriageways will have a width of 5.5m wide and all footpaths will be 2.0m wide. It is intended that the internal road network will be adopted by the LHA and these widths are the minimum standards requested by BMBC Highways. In addition, all shared footpaths / cycleways will be 3.0m wide, also at the request of the LHA.
- 2.3.2 ATE has raised a concern that areas of the site will encourage speeds in excess of 20mph which would pose a risk to pedestrians and cyclists, and also reduce the quality of the environment. The proposals have been designed with a 20mph design speed; in many areas, urban design features and built form have been used to provide natural traffic calming.
- 2.3.3 Indicative raised tables have been shown at Church Street East's junction with Cock Clod Street, as well as at the central staggered junction, which form traffic calming features. Ongoing discussions are currently taking place with BMBC Highways and TfGM in relation to a site wide traffic calming scheme. The result of the introduction of further traffic calming features to reduce vehicle speeds supports the removal of the shared footway/ cycleways to be replaced with on-street cycling.
- 2.3.4 It should be noted that on-street cycling on a carriageway with a width of 5.5m and subject to a 20mph design speed would be appropriate and safe.
- 2.3.5 Concern has been raised regarding the provision of a universal carriageway width of 5.5m, as well as long or intermittent stretches of dropped kerbs / driveway access, which could result in parking on footways. It should be noted that the internal road layout has been designed in accordance with the requirements of the LHA to enable adoption.

2.4 Accessibility for Pedestrians, Cyclists and Disabled Users (Parking)

- 2.4.1 ATE have stated that the use of verges on the internal road network to separate the carriageway from the footway / cycleways is supported, as it helps to prevent vehicles from parking on kerbs.

2.4.2 ATE have raised concern regarding the pedestrian environment; in particular the needs of disabled users, due to long / intermittent stretches of dropped kerb / driveway access, as it encourages parking on the footways. As noted previously, the roads and footways have been designed to an adoptable standard in liaison with BMBC Highways; however, some of the longer lengths of dropped crossings have been designed out.

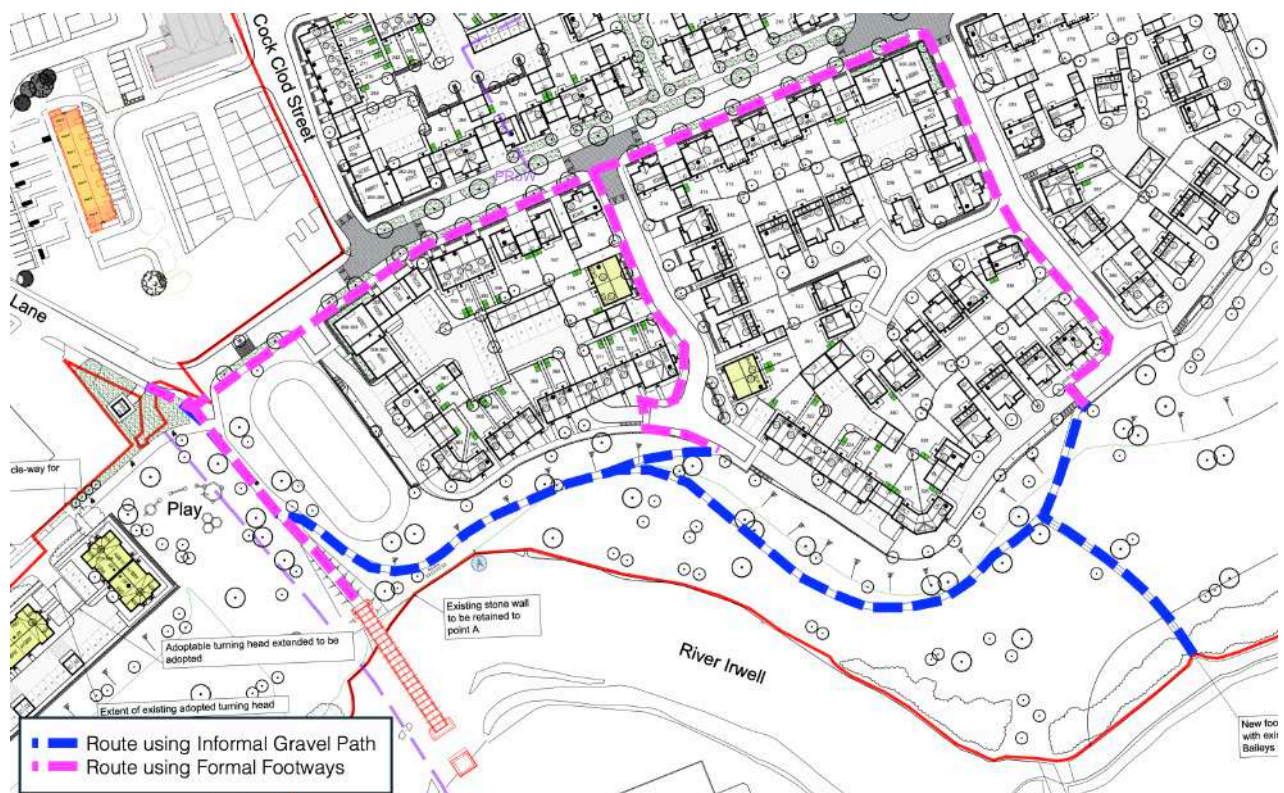
2.5 Surface Quality of Leisure Routes

2.5.1 It is noted that ATE has raised concern regarding the provision of some gravel footpaths. These informal footpaths are located within the flood plain and the surfacing type has been proposed with consideration to the environmental requirements within this area of the site.

2.5.2 It should also be reiterated that the gravel footpaths are informal and are therefore not required to be constructed to the standard suggested by ATE. The informal footpaths are not exclusive routes, and there are formal routes proposed within the site from Rectory Lane which are surfaced to an adoptable standard. Both the formal and informal routes as shown in [Figure 2.2](#).

2.5.3 In addition, the informal routes have no onward links to accessible areas and lead to naturally steep and vegetated areas.

Figure 2.3 : Formal Pedestrian Routes and Informal Routes (image source : Morris Homes)



- 2.5.4 Whilst these gravel surfaces may not provide the most appropriate surface for pushchairs, wheelchairs and mobility scooters, alternative formal footpaths are available for users. The informal routes are therefore more suited as leisure routes, which will be used less frequently, as intended.
- 2.5.5 Play areas located within the open space have been located to have direct connections to formal surfaced routes.

2.6 Cycle Parking

- 2.6.1 ATE have concerns that the dwellings are not provided with garages where bicycles can be parked in.
- 2.6.2 Parking has been provided in accordance with BMBC's local adopted parking standards, in Development Control Policy Guidance Note 11 '*Parking Standards in Bury*', adopted in May 2007, which states that houses are not required to provide cycle parking. The absence of cycle parking has also not been raised as a concern by the LHA.
- 2.6.3 It should be noted that properties without garages have gardens and residents who wish to purchase external cycle parking, such as a shed, can do so.

2.7 Travel Plan

- 2.7.1 ATE have raised concerns that the mode share targets '*do not align with government policy for half of all journeys in our towns and cities to be made by walking, wheeling and cycling*'.
- 2.7.2 In the Residential Travel Plan, a target of increasing sustainable trips by 10%, and reducing single occupancy car trips by 10%, was stated. These targets should be 'SMART' - specific, measurable, achievable, realistic and time-related. A 10% uplift in sustainable trips is considered to be a realistic and achievable target, which is often used in travel planning, and was not raised as a concern by BMBC Highways.
- 2.7.3 As outlined in the Residential Travel Plan, based on the journey to work data from the 2011 Census for the population living in the site area, only 10% of residents are expected to travel to work by walking, wheeling and cycling. Increasing this to 50% over a 5-year period is therefore unrealistic.
- 2.7.4 Mode therefore believes that a target of increasing sustainable trips by 10% at the development is appropriate and realistic. Should these targets not be met, the specific reasons will need to be identified, possibly through the modification of the Resident Travel Surveys to provide an opportunity for residents to raise any concerns or provide input onto what would encourage them to travel sustainably.

- 2.7.5 Once these are understood through future surveys, in liaison with the LHA and Local Planning Authority, the Travel Plan can be updated accordingly and new site-specific measures can be outlined, implemented and robustly monitored.

3. Summary

- 3.1.1 This note has been prepared in response to comments raised by ATE in relation to the reserved matters application.
- 3.1.2 On review of the response to each comment raised, it is respectfully requested that the ATE amend their recommendation for deferral of the reserved matters application.

APPENDIX A

Active Travel England Consultation Response



Active
Travel
England

Active Travel England
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Your Ref: 70284
Our Ref: ATE/24/00032/RM
Date: 26 January 2024

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

From: Planning & Development Division, Active Travel England

To: Helen Leach, Bury Metropolitan Borough Council

Application Ref: 70284

Site Address: Former East Lancs Paper Mill & Tower Farm, Church Street East, Cross Lane, Cock Clod Street & Brook Street,, Radcliffe, M26 2PG

Description of development: Application for reserved matters approval (appearance, landscaping, layout and scale) for the erection of 400 dwellings, relocation of cricket pitch, including a pavilion, practice nets and scoreboard and including all details required to discharge the following conditions from application 67597; 9 (Acoustic Attenuation); 11 (Surface Water Drainage Proposals); 13 (WSI for Archaeology); 14 (Bat Roost Assessment); 15 (Bat Survey for New Cricket Club Site); 16 (Otter Assessment); 18 (Bird Survey for New Cricket Club Site); 19 (RAMS for Badger Habitat); 20 (Invasive Species Report); 21 (Water Framework Directive Assessment); 22 (No Negative Impacts on River Irwell Ecology); 23 (Landscape & Habitat Creation Details); 24 (Affordable Housing Scheme); 25 (Recreation Scheme); 27 (Phasing Plan); 28 (Internal Road Pattern Details); 29 (Scheme of Levels, Drainage & Modelling to support Approved FRA); 31 (FFL's of Dwellings); 32 (River Irwell Buffer Zone Details); 37 (Replacement Cricket Club Facilities); 39 (Highway Details); 40 (Scoot at Water Street); 41 (Parking Strategy); 44 (Travel Plan)

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 the submitted application for Reserved Matters consent for the construction of 400 homes on the site of the former East Lancashire Paper Mill which is situated on land to the east of Radcliffe town centre and southeast of the A6053 Spring Lane and north of the River Irwell.

The principle of residential development on this site is established through an outline consent granted in December 2018 which also involves the relocation of a cricket pitch from its existing central location to the eastern periphery of the site.

This application is submitted in pursuance of the above and therefore seeks approval for a number of aspects of the development of which ATE is keen to review those in relation to the internal layout, the degree of safe and inclusive connectivity and permeability inside and outside of the development as well as the likely effectiveness of the Travel Plan in encouraging and embedding healthy and active lifestyles.

2.0 Summary

Following a review of the application, the matters below require to be considered further in respect of national policy requirements for quality of placemaking to serve new residents, the likelihood that the development will successfully encourage active lifestyles and the on-site infrastructure proposed. The issues raised are summarised in the following headings:

- Safety of Access to Cross Lane
- Update on improvements to Rectory Lane
- Internal vehicle speeds and quality of environment
- Accessibility for pedestrians, cyclists and disabled users
- Surface quality of leisure routes
- Cycle Parking
- Travel Plan

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:

*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;*

*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 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;*

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.

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*

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.

Local Transport Note (LTN) 1/20

The above document provides guidance to local authorities on delivering high quality, cycle infrastructure.

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.

4.0 Opportunities

Location

The site is located within reasonable proximity to a number of local facilities located to the west of the site, including the Radcliffe tram stop and the area around Blackburn Street, which provides a number of essential services and amenities. These are located approximately 600m and 900m from the centre of the site via Spring Lane and Church Street West respectively, although there are a number of current deficiencies in the quality of the existing routes.

Surrounding Improvements

Related to the above concerns, it is understood that a number of enhancements are in the process of being finalised and delivered. Firstly, the Greater Manchester Combined Authority has undertaken the necessary preliminary design work and has obtained Active Travel Fund 4 (ATF4) funding to deliver a new walking and cycling access to the Radcliffe tram stop through Festival Gardens with an accompanying Sparrow crossing over Church Street West. This will provide an inclusive access from the east and reduce considerably the distance to the tram stop from the site, which currently can only be accessed by passing underneath the current viaduct and accessing via the opposite side of the tram route, which involves passing under a tunnel to access services into central Manchester.

A second intervention relates to the delivery of a new bridge and shared path to link to the southern side of the River Irwell, with the southern end of Rectory Lane to the west of the site. The site, together with the approved enhancements described above places a key responsibility for the quality of Rectory Lane to be upgraded from its current state for walking and cycling given the intermittent quality of this route.

Submitted Masterplan

It is considered that the submitted masterplan responds positively to the need to enhance desire lines to the west through the delivery of a strong and legible east-west route through the centre of the development which will link the new community along with existing residential catchments to the east by extending Church Street East into and through the development to Rectory Lane. This provides a direct and legible pedestrian and cycle linkage to both Spring Lane and Church Street West for the majority of new residents.

5.0 Areas of Concern

Rectory Lane

While it is acknowledged that any off-site upgrade or improvement to Rectory Lane would have been a matter for the outline application, that is some time ago and information is requested as to whether any works will be delivered along Rectory Lane and how these will be aligned with the delivery of this development. It would be unfortunate if the above improvements to the surrounding area together with the direct and legible accessibility of the development were let down by the safety and quality of the 'middle section' along Rectory Lane from the development to Church Street West and to the new bridge to cross the River Irwell to the south.

Junction Treatments

The lack of safe facilities for cyclists at each of the site's junctions with Cross Lane is of concern and it is encouraged that these junction designs are revisited as part of the section 278 agreement to deliver a LTN1/20-compliant solution in each case, given the emergence of safer and more up-to-date design expectations in the time following the outline application was approved. For instance, and given the likely traffic levels, it is not considered necessary to have a two-lane exit from the site, which is provided at the expense of pedestrians and cyclists, where improved provision could be given over to active modes. The movement required to be undertaken by cyclists turning right out of the site, for instance encounters a number of conflicts and will do little to encourage cycling from this site.

Internal Layout

A review has been undertaken of the submitted layout, with the following concerns raised:

Highway Design The internal layout comprises a largely established approach to highway design of a through route (Church Street East) and a number of connecting secondary and tertiary streets with private drives proposed along the southern extremities of the site. Aside from the private drives (which narrow to 4.8m and 3.5m), a universal carriageway width of 5.5m is proposed, with 2m footways on each side of the carriageway. The exception to this is Church Street East, which provides a 3m shared footway / cycleway on its northern side.

Placemaking Following guidance contained within Manual for Streets (MfS) and the National Model Design Code (NMDC) all such routes should be designed to encourage speeds of less than 20mph. There is a concern that the long length of straights along Church Street East on either side of the central 'staggered' junction could encourage speeds beyond this at the risk of the safety of pedestrians / cyclists and the quality / nature of the environment. High quality residential environments all have a similar theme that ensures (through design) that a motorists feels like a 'visitor' in a safe and inclusive space where the needs of the most vulnerable users are prioritised.

It is therefore recommended that if this layout is to meet the requirements of national design guidance that this goes beyond 'traditional' approaches which are then required to incorporate traffic calming features from the outset (or retrospectively) and instead incorporate home zone shared-space principles. This would reduce the visual monotony of excessive hard surfacing and improve motorist behaviour, whilst avoiding intermittent footway quality owing to the visual domination of dropped-kerb vehicular accesses (see below).

Shared Pedestrian / Cycle path While the use of shared pedestrian / cycle routes is considered by LTN 1/20 as a last resort that should be avoided in urban areas, the provision along Church Street East and the street connecting to Cross Lane will be a fairly isolated piece of infrastructure that does not form part of a strategic cycle route and on this occasion, the application of shared use is considered acceptable, although in the event that conflict occurs between pedestrians this may encourage cyclists to use the carriageway.

Parking the use of verges / planting on the primary streets to separate the carriageway from the footway / cycle lane is supported and helps to prevent / deter mounting of kerbs, although it is clear that some form of parking restraint such as TROs (Traffic Regulation Orders) or bollards may be necessary to reduce the blight of inconsiderate and obstructive parking, as is the case within numerous developments across the country where highway design fails to eliminate anti-social parking.

Clarification on parking would be welcomed to avoid a situation where footways on secondary and tertiary streets become obstructed as a result of the proposed 5.5m width, which can commonly result in footway parking on both sides of the street as motorists attempt to maintain 3m of clearance along the centre of the road. This is neither safe for pedestrians nor pushchairs / mobility scooters, nor is it conducive to a high quality street scene and can result in conflict within the carriageway.

A further blight to the pedestrian environment, and in particular the needs of disabled users are long or intermittent stretches of dropped kerb / driveway access. This serves to further encourage footway parking while creating a crossfall that can cause wheelchairs and mobility scooters to lean, causing anxiety and potential injury to users. Where this is unavoidable, the designers should seek a flatter crossfall with a steeper drop-kerb

gradient, to ensure as much of the footway as possible is on a reliable and consistent camber in line with the requirements of Inclusive Mobility.

Footpath Surfacing

The masterplan incorporates and therefore encourages physical activity via a number of routes to the south of the housing that are defined on both the original outline masterplan as well as the submitted layout. While these are welcomed, they are fewer in number than the 2018 masterplan while their future utility are of significant concern where they are poorly surfaced in finishes such as loose-bound gravel.

Surface quality affects the comfort and effort required when using a pushchair, wheelchair or a mobility scooter. Loose surfaces such as gravel or mud can also present a skidding hazard, increase the risk of punctures and make clothing dirty in bad weather. Users are also affected by ruts and potholes that can throw them off balance. Smooth, sealed solid surfaces offer the best conditions for reliable everyday use.

ATE is aware of a number of examples of where a non-sealed surface has worn badly and became unsuitable. Self-binding gravel can often be loose and dusty, have poor skid resistance, and is not durable. Given the aims of this development to encourage active lifestyles, it would seem sensible to insist on a surface that can support future high levels of use without becoming unusable or requiring a high level of maintenance.

Inclusive mobility: making transport accessible for passengers and pedestrians states on page 124 in the chapter on Access to the Countryside states that 'All path surfaces should be compact, firm and stable' and that 'Loose sand, gravel, woodchips and cobbles should not be used'. The use of such material in this location does not 'address the needs of people with disabilities and reduced mobility in relation to all modes of transport' as required by NPPF paragraph 112 b.

Cycle Parking

A number of properties do not have garages and so it is unclear how these homes will encourage take-up of cycling where there are no safe and secure facilities to store bicycles. Details of this could not be located within the application supporting documents and it is therefore requested that this is addressed to the satisfaction of LTN1/20 which requires that 1 cycle parking space is provided per bedroom for new properties. These facilities should be easily accessible by residents and avoid the need for cyclists to wheel bicycles through living areas of properties.

Travel Plan

The Travel Plan provides a number of mode share targets, but these do not align with government policy for half of all journeys in our towns and cities to be made by walking, wheeling and cycling. Details of actions to be taken if the targets are not met are also missing and should be outlined and committed to with the intention for these to be secured, implemented, and robustly monitored and actioned upon.

6.0 Next Steps

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Notwithstanding the status of the development, having achieved outline consent and with several matters already considered and agreed, these recommendations highlight a number of crucial and realistic concerns which it is felt will result in deficiencies in the sustainable transport 'offer' this development makes to its residents. ATE is happy to discuss these matters with the LPA to understand what changes are achievable within the context of current submissions given that a number of decisions will have been established through previous approvals. ATE therefore requests that these comments are also shared with the applicant and its agent for consideration and future dialogue.

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