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## Active Travel England Planning Response

### East of Gamston/North of Tollerton Development Framework Supplementary Planning Document (SPD)

From: Planning & Development Division, Active Travel England

To: Rushcliffe Borough Council

#### 1.0 Background

Thank you for consulting Active Travel England (ATE) on the draft SPD which relates to the same area covered by two live planning applications, 20/03244/OUT and 24/00347/HYBRID.

ATE have made extensive comments to in response consultations through the development management regime and there are obvious linkages to this boarder strategic document. The SPD is an important opportunity to provide direction to the development for the different developers and use design coding to help set out the requirements and set expectations. Vital for ATE will be understanding the infrastructure requirements to help support mode shift towards walking, wheeling and cycling and providing a range of easily accessible on site amenities and facilities to help internalise trips. We would expect transport assessments to help scenario test high active travel mode shift and guide the development with a thorough and high ambition travel plans.

ATE have had a statutory role in the planning system since June 2023 as a statutory consultee for development management via Schedule 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This requires consultation on planning applications of equal to or exceeding:

- comprising of 150 homes or more
- more than 7,500 square metres in size
- an area of at least five hectares.

Other statutory consultees are referred to in the SPD, such as the highway authorities, in this the same way it would be useful to acknowledge ATE's role in supporting movement.

The draft SPD and design code make some good acknowledgement of active travel and how it should be prioritised, such as Sustainable Transport Strategy at the end of the document, however this approach should be embedded through all relevant sections,

particularly the vision and early development objectives. It is crucial that a strong vision for active travel drives the SPD to help deliver this as the Sustainable Urban Extension as development is described, build on by a robust approach vision led transport planning. Active travel should not be hidden in the last chapters given the primacy given to walking and cycling in the NPPF.

## 2.0 National Policy and Guidance

To help frame ATE's comments below are the key hooks into national policy.

A key part of the most December 2024 NPPF revision is the requirement for an emphasis on vision led transport planning, moving away from relying solely on modelling the worst-case scenario which typically considers high levels private car use first.

109. Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; e) identifying and pursuing opportunities to promote walking, cycling and public transport use;

...

115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code, ...

117. Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; 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; ...

Not part of the transport chapter but equally important is section 8 Promoting Health and Safe Communities which includes;

96 Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lives, through both promoting good health and preventing ill health, especially where this would address identified local health and well-being needs

and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Other relevant national policy and design guidance to Active Travel are as follows;

Cycling Walking Investment Strategy DfT - this is a key strategy document first published in 2017 by Department for Transport to make cycling and walking the natural choice for shorter journeys or part of a longer journey. This approach strongly aligns with the long held policy direction in the NPPF that the planning system should actively manage growth to make the fullest use of public transport, walking and cycling by focusing on sustainable locations. The first CWIS in 2017 was updated in 2023 with an ambitious target that 50% of journeys within urban areas should be by active modes by 2030.

Manual For Streets (MfS, 2007) in section 4 describes layout and connectivity and in particular that walkable neighbourhoods are characterised by having a range of facilities within 10 minutes' walking distance, typically a distance of 800m. MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents. Section 3 requires that the movement of all users should be key to the design and layout of new development.

Local Transport Note 1/20 (LTN 1/20) provides guidance to local authorities on delivering high quality, cycle infrastructure, including chapter 14 which sets out how to plan for and integrate cycling infrastructure with new development.

Design for the Mind - PAS 6463 (2022): gives guidance on the design of the built environment for a neurodiverse society, making places more inclusive for everyone.

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. This includes, among other things, providing walkable communities, connected active travel routes, multi-functional open spaces, and high quality streets and spaces.

Connectivity Tool - The Department for Transport has recently published the Connectivity Tool, a national data point metric to help rank areas based on their connectivity to facilities, service by active travel and public transport and is available free to all public bodies. Presently the area along the Tollerton Road towards the centre of the allocation scores 48-40 on the index out of 100. This compares to a score of 64 to 69 at the Gamston district centre and after that north along Ambleside. Closer to the centre of West Bridgeford scores 83 likely to be on account of a wider a range of amenities and greater accessibility. The tool allows users to model improvements to help test whether the score can be increased. More information is available from, <https://www.gov.uk/guidance/connectivity-tool>

### 3.0 Comments

ATE would like to make the following comments set out in the running order of the document. It is noted that the cross references to the figures are often incorrect in numbering.

#### National Guidance page 13

It is welcome that reference is made to the Building for a Healthy Life tool. There are several key hooks within this for active travel related to walkable neighbourhoods and direct and segregated active travel (walking and cycling) and include safeguards for personal safety. At 1.44 as well as the LPA using this tool, ATE would propose that the developers must also use the tool explicitly and submit their own BHL assessment of their applications to help embed the principles more clearly in the final design.

ATE proposed change to para 1.44

*1.44. This (or any document(s) that supersede that document) will be used to assess planning applications submitted for consideration. Applicants' will also be required to make use this tool and submit their assessment for scrutiny through the planning applications regime.*

ATE suggested additional text shown underlined

The text could notably go further and promote BLH Commendation route aspiration which required nine green lights on the scoring matrix.

Further additional text could be:

*Applicants would be very much welcomed from developers who score highly enough to be eligible for BHL Commendation.*

Not included in this national guidance section but referenced in our National Policy and Guidance section above is Active Design <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design> This is a co-badged national guidance with Sport England, Office for Health Improvement and Disparities and ATE to help drive design that encourages and promotes activity, whether that's a walk to the shops or creating buildings that are active inside and out. It also includes useful case studies which would be directly relevant to the development the SPD aims to support. ATE would strongly encourage reference to this document also within the national guidance section.

#### Vision page 15

As set out above the update last year to the NPPF, placed a new focus on 'vision led' transport planning, para 109. This now explicitly requires "*a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.*" Points a) to f) in this paragraph list all the matters to consider within the vision exercise and include at c) "*understanding and addressing the potential impacts of development on transport networks.*"

The vision of the draft SPD is not advertised as fulfilling the 'vision-led' approach to transport planning for the site, but it could be, and perhaps should be, at least the starting point and give signals in terms of what is expected. Whilst SPD vision includes relevant clues on places, people and streets it would benefit from further detail particular on bullet point c) of para 109 and acknowledging the barrier of the A52 for walkers, wheelers and cyclists for desire lines destinations beyond the site boundaries. The on site facilities and employment will help internalize trips, but high order services and needs will push movement to off site destinations.

ATE and other transport bodies met in the summer to help focus on a more joined-up transport vision for the site to consider the barriers to creating a more sustainable transport vision and measures to help remove those barriers. It would be worthwhile reflecting on these issues and providing a steer within the SPD that they need acknowledgement and addressing.

Masterplan maps and diagrams should also reflect the off site desire lines for walkers, wheelers and cyclists towards West Bridgeford and Nottingham City Centre as highlighted by the facilities map on page 35.

ATE's vision as an agency of Department for Transport is that everyone should have an attractive and safe choice to walk, wheel or cycle. Our target from DfT's 2023 Cycling and Walking Infrastructure Strategy is that half of all short trips in should be walked, whelled or cycled by 2030. <https://www.activetravelengland.gov.uk/about>

The vision in the SPD tends to recycle national policy and guidance and perhaps would do well to be more ambitious and help drive the development to have higher quality of life and sustainable aspirations for it's residents. Page 18 talks of 'encouraging active travel for parents and children.' The word 'encouraging' does not hold the developer to account or provide certainty about the look and feel or expectations and linked to the 'heart' only speaks of internal trips. Health and wellbeing again talks of internal trips only, what about it being an 'sustainable extension' of Gamston and integrating and making connections to this established community?

#### Walking and Cycling page 33 – Site Context section

This section lists current PRow and Bridleways and its described as 'a network that accesses local shops, schools and employment in West Bridgeford'. Elements of the figure 13 map may be part of the PRow network, but ATE would question whether this loose connection of footpaths and bridleways are a network of walking and cycling active travel routes that people would find coherent, direct, safe, comfortable and attractive (LTN 1/20 core principles) to access the high order facilities west of the A52 as described. FP6 for instance as an uncontrolled and no infrastructure crossing of the Strategic Highway Network across A52 with high vehicle speeds. Note also in respect of the facilities map page 35, para 3.42, it may be technically possible to access West Bridgeford by PRow, but how feasible is it that this would be an everyday, all year round, route for walkers, wheelers and cyclists that people would choose this route.

This section needs to also include reference to the Local Cycling and Walking Infrastructure Plan (LCWIP) work. At the time of writing our first response the planning applications linked to the SPD site, a recent LCWIP update in October 2022 and crossing over the river Trent as a short term priority for the Rushcliffe area. There may be relevant updates to this project and possibly an updated list of projects to report on here.

#### Site Considerations & Opportunities page 40

Section para 3.65 on Highways this section need to be bolstered to also address site considerations and opportunities for active travel as set out above.

There are major opportunities to internalize trips and reduce reliance on the private car with the timely delivery of on site facilities and a hard working, high ambition and robust travel plan. However this section needs to acknowledge the significant barrier of A52 and access to off site amenities and set out how this needs to be addressed, planned for and vision led scenario tested. It should help address the priorities for active and sustainable travel of the NPPF paragraphs 109, 115 and 117 clearly.

Uses – para 3.66, how will the mix of uses create a sustainable place to live, what are the things that need to happen to support this statement. More specific details are needed here to help set out the priorities for this.

### Development Framework

4.3 Welcome reference to 'movement framework' which needs more specific emphasis in the Design Objectives.

4.5 Design objectives – welcome the requirement to integrate the development into the wider built up area, however this also requires sustainable connections and movement that are not explicitly mentioned and need to be. This section needs to explicitly address the movement challenges and set an approach for transport to deliver the 'sustainable and environmentally responsible development' also sought.

ATE would suggest a new movement objective is needed, for instance:

- *To create a new settlement where active and sustainable travel are a natural choice for local journeys and offer a genuine choice of modes for journeys beyond the site boundary.*

Page 44 - East-West greenway through and beyond the site is welcome and linking with the established PRoW towards the existing Gamston community. These connections, however, need to be more than a leisure and recreational route if they are to support genuine modal shift away from motor vehicle reliance, or part of a network hierarchy of other routes. Leisure routes are often unlit, lacking all weather surfacing, maybe isolated in stretches, raising personal safety concerns and preventing use all year round and in inclement weather. They are unlikely to support wheelers well also. Similar concerns re Linear parks page 45.

Page 45 Health and Wellbeing – welcome cycle and footpath trails, which should also be available for every journeys and connections to daily needs to help emphasize active travel as a realistic choice, they must connect cul de sacs and help also to provide great street level permeability for walkers, wheelers and cyclists; not be mown paths through landscaping that cannot be used all year round.

Page 45 Movement and circulation – this lacks any direction for active travel and avoids talking about the connection over the A52, vital to create the sustainable urban extension proposed. Whilst down grading the Tollerton road is helpful, its limitations for active travel presently in the planning application ref 24/00347/HYBRID are limited by land in the control of the local highway authority for additional AT infrastructure. The SPD should be clearer on what therefore is required of developers within their development parcels and how they need to help prioritise active travel.

Page 45 Neighbourhood Areas – character distinctions are vital to help navigation around the new settlement, as its street structure and hierarchy together with wayfinding and public art and placemaking. The connections between these areas need guidance in the SPD, to prevent one area 'turning its back' on another, streets and connections must face onto each other to help integrate the new community, using public spaces and streets, to help support active frontages to reduce personal safety concerns, avoid blind spots. Such an approach would prevent barriers to active travel being inadvertently introduced, and the default becoming the private car for local journeys.

### Land Uses page 46

Neighbourhood Centres and Community Hub 4.14 – welcome the integration with the wider development and established uses on site. If the centres to serve daily needs this

integration must include recognition that active and sustainable trips to/from this land use within the site need to be afforded primacy in the design and layout of the development and be included in this 'careful consideration'. It would be helpful to add to the final sentence in 4.16 to resolve this deficit by expanding what 'accessible and active hub' are.

Employment – page 48 – welcome note on accessibility from primary street, access from a permeable street hierarchy of interconnected quieter routes should also be considered and the expectation that active travel connections should be integrated into the employment development to support high active travel trips by a robust travel plan and targets. No reference is made to access by sustainable means as the education uses are.

Education- Secondary and Primary. Welcome reference to sustainable access, given the catchment will be from the SUE it would be good to state that the development will need to provide for access by high levels of active and sustainable trips, led by a robust travel plan and targets. Most secondary students travel independently to school so personal safety is important as well as sufficient supporting infrastructure such as secure cycle parking, storage lockers and activation initiatives aligned to the school curriculum such as climate change responsibilities and physical education.

Please also note ATE are due to shortly publish specific planning and design guidance on designing for schools. Key to this is making AT front and foremost in the access strategy, moving car parking to less prominent locations and creating a central plaza boulevard entrance rather than letting vehicles predominate. Schools will additional active travel dedicated access points also show the primary importance of this mode and help create a more permeable community focused site. These are all very visible ways to promote active travel in design and layout. Making a slight change to para 4.25 would help secure this: It is directly linked to a series of pedestrian and cycle routes which are well connected to the proposed open space and residential neighbourhoods and continue on the desire line to the school front door.

Para 4.26 and 4.29 – misses the opportunity to require cycle parking to council or national recommendations (presently LTN 1/20) and supporting facilities changing, lockers, drying spaces for both staff and students, and a robust and thorough travel plan with high mode for active travel. Their own Transport Assessments should be vision led to create high levels of active travel trips. Please include this as additional bullet points.

Blue and Green Infrastructure – 4.31, welcome note on good pedestrian and cycle connectivity for new and existing residents, but please see our concerns above re the limitations of leisure routes. *Leisure routes are often unlit, lacking all weather surfacing, maybe isolated in stretches, raising personal safety concerns and preventing use all year round and in inclement weather. They are unlikely to support wheelers well also. Similar concerns re Linear parks page 45.* Whilst recreation and leisure opportunities are important, they serve different purposes to daily trips all year round by active travel. ATE would like to suggest the two issues are distinguished and planned for accordingly. Please can the connectivity bullet point para 4.32 be amended to account for this, principally lighting surfacing and measures to protect personal safety and security are important. The indicative cross sections could also indicate that street lighting at street locations should be provided.

Connectivity page 55 – it is disappointing this wholesale misses the requirement to provide active travel especially given the primacy that the NPPF paras 115 and 117 in making these a high order priority. Why does the fig 32 not show an ATE link/s across the A52? ATE would recommend this section is bolstered by a new bullet point to recognise the importance of planning for active travel in national guidance and a link to a vision led



transport and movement strategy along the lines of the comments we have made above under the vision section. This section needs also to LTN 1/20 or successor documents to help future proof, Manual for Streets and the creation of walkable neighbourhoods etc.. Suggest that connectivity is moved to the Movement Framework to help set out a hierarchical approach and avoid confusion.

Movement Framework page 64 – welcome this approach, para 4.56 should be reflected within the vision for the site more explicitly. It should also consider the need of wheelers and those less able. It would be useful if this section could link also to ATE's advice and toolkit assessment criteria for sustainable development, which again provides key hooks and will help frontload the matters ATE raise at planning application stage; <https://www.activetravelengland.gov.uk/resources/spatial-planning> For instance we seek good quality walking and wheeling routing to public transport nodes and real time passenger information at all stops.

Again, this section misses the fundamental requirement to be direct about the challenges in crossing the A52 by active modes. This is part of the strategic road network one only currently facilitated by uncontrolled PRow crossings. It should be direct that resolving this inline with the NPPF paras 109, 115 and 117 is required. This needs addressing and should be a central part of transport work, to qualify active travel trip assignment in this direction and develop a consistent allocation wide strategy for this, that prevents developers dealing with their site in isolation. Note the requirements for crossings in table 10-2 of LTN 1/20, uncontrolled crossings are only suitable for low speeds and low traffic volumes.

Mobility hubs – para 4.60, NB – fig 33 does not show mobility hubs, is this meant to be fig 35? Welcome definition and bullet point requirements of these primary and secondary hubs. ATE would strongly recommend that cargo bike hire is included, to enable shopping and delivery trips to be included in the hire scheme, often trips that require a vehicle just by nature of cargo. Tricycle and adaptable cycle hire and parking would make a better inclusive hub. The delivery, specification and cycle parking quantum will also benefit from analysis through transport work, and this section should also add that as a requirement. Primary street section diagram welcome, text refers to segregated but section shows 5m apparent shared surface. Can this be clarified, segregated and shared routes are not the same thing (also para 4.67). Would this be 3m bidirectional cycle route? In which case a buffer, or stepped separation between cycles and pedestrians would be helpful. Please see LTN 1/20 chapter 6, figure 6.3. A 6m buffer whilst welcome, the width could also be used to provide more generous bi-direction and separation between peds and cycles. Although space should be made a regular intervals for cyclists to transition between site streets onto cycle tracks.

Primary streets also need care to avoid long straight featureless where vehicles may be tempted to increase speeds to the detriment of walkers, wheelers and cyclists. Support the strong active frontage where dwellings and buildings have a strong relationship with the street, this allows overlooking and will help moderate speeds.

Secondary streets - on plot parking at density means there is a risk of reversing cars conflicting with pedestrians and would best be avoided. This arrangement makes it difficult to support child friendly streets and removes the interaction of a more people focused environment, see fig 41. With a ambitious active travel and sustainability focus, could reducing car parking be a strategy, and minimum car standards be proposed? Removing on plot parking and making active travel options and routes more obvious and attractive would be a positive alternative to support modeshift. Link also to para 4.75-77 also, photos to illustrate the alternative parking arrangements would be useful.



An example on how to design similar car free streets such as Marmalade Lane in Cambridge is available here [Marmalade Lane, Cambridge: a new co-housing community | Active Travel England](#)

Active Travel England have also developed a microsite library to assist in masterplanning large developments which provides visual links to all relevant supporting advice and guidance in one place, <https://www.activetravelengland.gov.uk/planning-active-places>  
Para 4.67, can this section make reference LTN 1/20 principles or success or document please.

#### Vehicular Movement and Access Strategy 4.68-72

Can the requirement to a vision led approach to transport planning be covered here along with the need to also quantify active travel trips to ascertain the design and focus for active travel in the same way as vehicle trips. This will help test, for instance, whether shared use or segregated infrastructure is required and the type of crossing required eg table 10-2 LTN 1/20.

#### Sustainable Transport Strategy

There is much to welcome here, but as highlighted above this approach needs embedding throughout the document rather than two pages in isolation. The approach should try to address the conflicts and provide a steer on how to deliver an environment works for everyone.

Welcome site wide connectivity covered in Access and active travel infrastructure page 83. This is vital to ensure a well connect network is delivered. The highway authority must adopt connections up to site boundaries to ensure quality connections are open and maintained. This provides a hook as described for planning obligations. Please note travel behaviours can be difficult to break if motor vehicle access is delivered first with a lag time for communities if on site facilities and active travel routes are only delivered piecemeal at later phases. A site wide parameters plan could be agreed now to identify important routes and connections for all and underpin the phased construction to avoid gaps and lag times. Para 5.4 – should this refer to fig 45?

#### Framework S106

It is welcome that the SPD sets out anticipated requirements, however as yet ATE are yet to support at grade crossings of the A52 and remain to be convinced on the limited evidence in the transport work done so far to support the designs associated with the two planning applications still under consideration. At grade crossings on the SRN are also a concern for National Highways. Delivery of a route away from the desire line in a convoluted multi stage crossing arrangement risks people diverting to a more direct crossing route without supporting infrastructure and presents a safety concern. ATE again defer to table 10-2 within LTN 1/20 on Crossing Design Suitability and ask how what is proposed here without supporting evidence is this the correct solution.

#### Site wide Design code

This is welcome, in particular 4.1 Mobility strategy, “Strategic cycle and pedestrian links will be established alongside first occupations, to influence early-on travel habits.” This approach needs more close reflection within the main SPD and S106 framework, that these should be provided on occupation.

Can fig 5 included on site facilities and link to the desire lines outside the site, a major one being the link to Ambleside north west of the site. This appears to lead foot and cycle trips to the uncontrolled crossing of the A52 on the established uncontrolled PRoW line. There would be benefit referring to the LTN 1/20 core principles here in laying out routes linked to trip destinations.

4.2 welcome reference to LTN 1/20, please also include successor documents, note also manual for streets.

4.4 see comments above linked to conflicts between recreation and active travel routes. Mandatory requirements – more clarity needed as above with regards to segregation and bi-directional/2 way routes, as LTN 1/20 describes shared routes serve some users poorly see 6.5.6.

4 should mandate all weather surfacing to active travel routes.

7 Should link quantum of cycle parking to local standards or LTN1/20 or successor. Primary street cross section diagram – note comments above.

Thank you for consulting Active Travel England on the draft SPD and design code. We welcome that AT is covered and would like to it appear earlier and more centrally to the vision and early stages of the policy guide. We would be happy to discuss our comments in more detail.