

# Comments for Planning Application 25/00424/FPM

## Application Summary

Application Number: 25/00424/FPM

Cycling UK Stevenage - Comments for Planning Application 25/00424/FPM

Address: Stevenage Swimming Centre St. Georges Way Stevenage Herts SG1 1XY

Proposal: Demolition of existing Swimming Centre and erection of new sports and leisure centre with associated parking, landscaping and access.

Case Officer: Rebecca Elliott

## Customer Details

Name: Mr Teun van Leeuwen (Cycling UK Stevenage)

Address: [REDACTED]

## Comment Details

Commenter Type: Organisation

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:

This objection is submitted by Cycling UK Stevenage, focusing exclusively on cycling infrastructure and access provisions within this application.

Given the importance of this development to our whole community, we have looked at this application in great detail. However, these comments were written and should be read in context of what they mean in reality for users of this leisure for decades to come. For a Leisure Centre development the LTN 1/20 Summary Principle "Cycle infrastructure should be accessible to everyone from 8 to 80 and beyond" is imperative.

In brief, we observed that:

- The Transport Assessment and Design and Access Statement contain significant gaps: missing cycle traffic forecasting, incomplete cycle parking specifications, and inadequate cycling-specific analyses on several points. These documents must be completed before approval.
- Multiple elements violate established policies—including Active Travel England guidance, LTN 1/20, and local planning requirements—requiring mandatory changes before approval.
- We welcome several positive elements of this planning application.

We welcome and approve of the amount of cycle parking, the ratio between car and cycle parking. Under important conditions we also welcome improvements to town centre accessibility, the attention to pedestrian infrastructure, the provision of secure cycle parking for staff.

Active Travel England (ATE) has commented on this application, which underscores the significance of the development. Their response refers to their standing advice note. Much information is missing from the planning application, a significant part of which is stressed to be essential in the ATE advice note:

## Missing information

1. **Planning Application Assessment Toolkit missing:** 1.12 of the ATE standing advice note encourages the completion of their Planning Application Assessment Toolkit for this planning application. This has not been done, risking the quality of included walking and cycling provision.

2. **Cycle traffic forecasting missing:** ATE standing advice note 2.2 requires transport assessments to forecast volume and distribution of walking, wheeling, and cycling trips. It should also consider national targets when doing so. Forecasting was done for car traffic, but not for active travel.<sup>1</sup> Before this is done, it cannot be assessed whether the proposed infrastructure is appropriate.
3. **Isochrone maps missing:** 2.5 of the ATE standing advice note states “Trip lengths to key amenities should be derived from isochrone maps using an appropriate point within the application site, rather than straight-line distances from site boundaries or main access points.” However, straight line distances are used instead.<sup>2</sup>
4. **Cycling erroneously merged with walking:** The application inappropriately merges cycling with walking in most instances. Cycles should be treated as vehicles, not pedestrians.<sup>3</sup> Additionally, ATE advises in 2.4 of the standing advice note that “a qualitative analysis of local pedestrian, cycling and public transport infrastructure should be presented to inform any necessary improvements that would be compliant with current design standards.” The following examples demonstrate that cycle access is discussed only superficially compared to other modes of transport:
  - 4.1. The application fails to acknowledge that the leisure centre sits between two cycling-prohibited zones (Town Centre and Town Centre Gardens). This is a major oversight and significantly severely compromises the accessibility of the site.
  - 4.2. The Transport Assessment Final Report states “The Town Centre and the surrounding area has an established network of footways and cycleways which provide access across the town centre, including to Stevenage Bus and Rail stations.”<sup>4</sup> While correct for walking, cycling is banned in most of the town centre which makes this statement incorrect.
  - 4.3. Where access for pedestrians, using public transport, and for motor-vehicles is discussed, only cycle parking is mentioned without discussing access.<sup>5</sup>
  - 4.4. Where active travel routes are discussed, ‘pedestrian and cycle routes’ connections are stated to have direct connectivity, but the report does not mention that for cycling this is only the case for 1 of the 4 routes listed.<sup>6</sup>
  - 4.5. While the new toucan crossing is mentioned to also be for cycling, the report merges cycling and walking in such a way that it is unclear whose connectivity between the town centre and Town Gardens is improved. A map with a provided overview of “key access requirements for Pedestrians and Cyclists” is not usable without distinguishing between walking and cycling.<sup>7</sup>
5. **Information about cycle parking cover missing:** The cycle parking is mentioned to be covered<sup>8</sup> but the specifics are not discussed. The cover is also not visible on the 3D renders. Without specifics it is not possible to evaluate whether the cover is appropriate (accessible design, sufficiently lit, sufficiently high), whether it interferes with the trees that are planned between the cycle parking, and whether it protects the cycles from the trees.
6. **Details on cycle lockers missing:** Details on the specifics of the stands and the cycle lockers are missing and must be provided. HCC policy states that “The final design for cycle parking should form an integral part of any full or reserved matters planning application. Full details of the location, type of rack, spacing,

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<sup>1</sup> See 6.0 of ‘Transport Assessment Final Report’ on p. 47 for car trip forecasting.

<sup>2</sup> See ‘Design and Access Statement Part 7, page 49

<sup>3</sup> See LTN 1/20 1.6.1 (2)

<sup>4</sup> See Transport Assessment Final Report, p. 31

<sup>5</sup> See Design and Access Statement Part 6, p. 203

<sup>6</sup> See Transport Assessment Final Report, p. 30-31

<sup>7</sup> See Transport Assessment Final Report, p. 32

<sup>8</sup> See Design and Access Statement part 6, p. 189

numbers, security, method of installation and access to cycle parking should be submitted for approval.”<sup>9</sup> This includes a confirmation of Secured by Design level 2 certification and a 10-year warranty.

7. **Cycle access from the south not discussed:** Cycling access to and from the south (or the lack thereof) is not discussed, despite being a known issue and being featured in the LCWIP (see 8.4 for more on this). It is a known problem and St George’s way features prominently in the LCWIP in the context of missing links and the potential to improve this as a part of the wider town centre regeneration.<sup>10</sup> In sufficiently thorough planning application of a development of this size, this issue would be recognised and discussed.

### **Non-compliance with relevant policies**

Point 1-7 focussed on where the information provided by the applicant is insufficient or missing. The following points lay out elements of the application that are not conform relevant policies and should be addressed before full planning approval is granted:

8. **Plans to improve cycle access from south needed:** Direct cycling accessibility from the South of Stevenage and from Bedwell and the east is not discussed or improved. Consideration should be given to improvements. The current arrangement can be argued to be sub-optimal based on the local plan, LTN 1/20, Manual for Streets 2. Changes to accessibility to the leisure centre from the east can address missing links and improve accessibility to sports for an area with high levels of deprivation (Bedwell)
  - 8.1. ATE also points out that in 2.3 that “measures to improve the accessibility of the location (such as provision/enhancement of nearby footpath and cycle path linkages) where these are necessary to make the development acceptable in planning terms” should be considered when formulating Transport Assessments’. The toucan crossing does not improve accessibility to the leisure centre that start outside of the town centre as the town centre is not a cycling through route. Where the application identifies 4 pedestrian routes, only 1 route is of use to cycling. While this route is qualitative improvement over the current cycle access, quantitatively there is still only 1 route for cycling.
  - 8.2. There is no direct pedestrian link from Bedwell to the leisure centre. The local plan prioritizes the addressing of missing links<sup>11</sup> and notes that Stevenage has areas of serious deprivation, particularly Bedwell<sup>12</sup>
  - 8.3. The cycle ban in the town gardens is against current best practice and planning should consider changes to this, now or in the near future.
    - 8.3.1. ATE states in 2.11 “the development should provide / safeguard pedestrian and cycling connections to neighbouring sites including **future** phases of development”
    - 8.3.2. LTN 1/20 (section 1.4.1) states “Design should begin with the principle that all potential cyclists and their machines should be catered for in all cycle infrastructure design.”
    - 8.3.3. LTN 1/20 (section 7.4.3) states “There should always be a preference for allowing cyclists to access VRAs unless there is good evidence that this would cause significant safety problems. However, the possible impacts on pedestrians, and disabled people particularly, must be considered carefully. Visually impaired people, in particular, may not feel comfortable sharing a pedestrianised area with cyclists” and in 7.4.5 that “Pedestrian and cyclist flows, street widths, the availability and safety of alternative cycle routes and the demand for cycling through the area should be considered when deciding whether including cyclists in the restrictions is

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<sup>9</sup> See Hertfordshire County Council Highways and Growth & Environment - Place & Movement Planning and Design Guidance for Hertfordshire Part 4, paragraph 2.1, p. 40

<sup>10</sup> See Stevenage LCWIP 2019, 3.7.3 p. 45

<sup>11</sup> Local Plan 2019, p. 181

<sup>12</sup> Local Plan 2019, p. 6

justified. Where they are judged necessary on safety grounds, restrictions on cycling may only be appropriate at certain times of day. For example, permitting cycling before 10am and after 4pm may enable commuter cycling, while avoiding the busiest periods of pedestrian activity. Cycling should not be restricted during any times when motor vehicles are permitted.”

8.3.4. Manual for Streets 2 states in 2.3.11 “Where there are proposals to introduce vehicle restricted or pedestrianised areas, the starting position should be that cyclists are allowed to continue to use the streets concerned. If there are concerns about conflict between cyclists and pedestrians, the preferred approach is to allow cycling from the outset on the basis of an experimental traffic regulation order and only restrict access when and if the need has been demonstrated.” And continues in 2.3.12 with “Advice on this issue is set out in TAL 9/93 ‘Cycling in Pedestrian Areas’<sup>10</sup>. This emphasises that, on the basis of research, there are no real factors to justify excluding cyclists from pedestrianised areas and that cycling can be widely permitted without detriment to pedestrians. This was confirmed by TRL report 583 ‘Cycling in Vehicle Restricted Areas’ (2003)<sup>11</sup> which established that cyclists alter their behaviour according to the density of pedestrian traffic by modifying their speed or dismounting.”

8.3.5. Work on a new LCWIP is expected to start imminently. It will likely identify the cycle ban in the Town Gardens as a barrier to cycling whose removal is recommended.

8.4. The new leisure centre will not have direct access to it from the south. Traffic free routes will require a considerable detour, while a low traffic route is complicated and indirect. Consideration should be given to how acceptable access from the south should be implemented.

8.4.1. ATE states in 2.7 that off-site infrastructure to amenities and the cycle network should be coherent, direct, safe, comfortable, and attractive. This reinforces the LCWIP, which identifies in 3.7.3 that St. George’s way is a missing link. The leisure centre, as a major destination, must address this problem in its plans.

8.4.2. A new lay-by is to be created along St George’s Way. Sport England expressed concerns regarding the deliveries of pool chemicals needing to take place across the public realm.<sup>13</sup> The applicant must address any potential conflict that this might cause in the implementation of plans laid out in the LCWIP to add a cycleway to St George’s Way.

9. **Shared use path against govt policy:** The cycle access to the site from Fairlands Way should not be shared use but should physically separate walking and cycling.

9.1. In 2.8 ATE points out that “The development should not be reliant on shared use routes in full or intermittently, which conflicts with the government’s clear position in paragraph 1.6.1 (2) of L T N 1/20 that cycles must be treated as vehicles and not as pedestrians.” And in 2.12 ATE states “Alongside this, shared use routes for pedestrians and cyclists should only be proposed where these meet the limited situations listed in paragraph 6.5.6 of L T N 1/20. Where shared use routes are acceptable, their widths should be at least 3m (<300 cyclists per hour) or 4.5m elsewhere, as per Table 6-3 of L T N 1/20.” The exceptions that LTN 1/20 mentions are not applicable or not shown to be applicable by the applicant. The specifications of the path are also not provided.

10. **Buffer between cars and cycles missing:** The path to be used by people cycling is not fit for purpose because it will lead to the path running directly alongside St George’s Way. This is unsafe and uncomfortable for the groups expected to use the leisure centre, particularly if this path is to be shared use.

10.1. ATE states in 2.7 that off-site infrastructure to amenities and the cycle network should be coherent, direct, safe, comfortable, and attractive. The volume of traffic on St George’s way makes it

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<sup>13</sup> See Design and Access statement part 6, p. 208

that there should be a buffer space between the cycle path and the motor traffic, which is preferred in LTN 1/20.<sup>14</sup>

10.2. The leisure centre is designed to be suitable for all visitors. The importance of this destination for vulnerable groups such as children and young people, and people with mobility issues who might be using adapted cycles means that safe access should be prioritised. Cycle infrastructure must be accessible to all and must be safe and perceived to be safe.<sup>15</sup>

11. **Access to cycle parking is indirect:** The route of the access path for cycling to the cycle parking must be made more direct.

11.1. The proposed route is less direct than the route for cars. People cycling will need to curve around the car park and circumvent obstacles, to reach the cycle parking. It should be changed so that cycling is “at least as direct – and preferably more direct – than those available for private motor vehicles”<sup>16</sup> to be compliant with LTN 1/20 and ATE advice note 2.11.

11.2. The shortest route for people cycling is to enter the car park and cycle straight to the cycle parking. According to LTN 1/20 indirect routes causes people cycling to choose alternative routes, even if these are less safe.<sup>17</sup>

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<sup>14</sup> See LTN 1/20 6.2.1

<sup>15</sup> See LTN 1/20 4.2.9

<sup>16</sup> See LTN 1/20 4.2.8

<sup>17</sup> See LTN 1/20 4.2.7

# Planning Application Issues Summary Table

Please refer to the full objection for full argumentation and policy references.

Category	Issue/Requirement	Policy Reference	Status
<b>Missing Information (needed to confirm compliance)</b>	Complete ATE Planning Application Assessment Toolkit	ATE 1.12	Not Done
	Forecast volume/distribution of walking, wheeling, cycling trips	ATE 2.2	Missing
	Isochrone maps from appropriate site points	ATE 2.5	Using straight-line distances instead
	Qualitative analysis of local cycling infrastructure	ATE 2.4	Superficial treatment only
	Cycle parking cover specifications (design, lighting, height)	HCC Policy	Missing details
	Cycle stands and lockers full specifications	HCC Policy	Missing
	Secured by Design level 2 certification + 10-year warranty	HCC Policy	Not confirmed
	South/Bedwell cycling access discussion	LCWIP 8.4	Not addressed
<b>Policy Non-Compliance</b>	Direct cycling accessibility from South/Bedwell not improved	Local Plan, LTN 1/20, MfS2	Non-compliant
	Measures to improve accessibility via cycle path linkages	ATE 2.3	Not considered
	Town Gardens cycle ban conflicts with best practice	LTN 1/20 7.4.3-7.4.5, MfS2 2.3.11-2.3.12	Against policy
	Safeguarding cycling connections to neighbouring sites	ATE 2.11	Not addressed
	Shared use route from Fairlands Way should be separated	LTN 1/20 1.6.1(2), ATE 2.8	Non-compliant
	Shared use route exceptions not met	LTN 1/20 6.5.6	Doesn't qualify
	Path width specifications missing	LTN 1/20 Table 6-3	Must be 3m or 4.5m
	Path directly alongside St George's Way unsafe	LTN 1/20, ATE 2.7	Needs buffer space
	Cycling route less direct than car route	LTN 1/20, ATE 2.11	Non-compliant
<b>Site Access Issues</b>	Only 1 of 4 pedestrian routes usable for cycling	Transport Assessment	Inadequate
	Town Centre cycling ban affects site accessibility	Current restrictions	Major oversight

Category	Issue/Requirement	Policy Reference	Status
	No direct pedestrian link from Bedwell	Local Plan priorities	Missing link
	St George's Way missing link not addressed	LCWIP 3.7.3	Known problem ignored
	Potential conflict: new lay-by vs future cycleway plans	Sport England concerns	Needs resolution
<b>Documentation Issues</b>	Walking and cycling inappropriately merged throughout	ATE guidance	Cycles treated as pedestrians
	Town Centre cycleway statement incorrect	Transport Assessment	Cycling banned, not available
	Key access map unusable without mode distinction	Design documents	Unclear for cycling
	3D renders don't show cycle parking cover	Visual documentation	Missing visualization