



Mark Youngman
Development Management Group Manager
Hertfordshire County Council
Postal Point CHN115
Farnham House
Six Hills Way
Stevenage
SG1 2ST

Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)

Director of Planning

East Herts District Council
Wallfields
Pegs Lane
Hertford
Hertfordshire
SG13 8EQ

District ref: 3/24/0966/OUT
HCC ref: EH/21132/2024
HCC received: 29 May 2024
Area manager: James Dale
Case officer: Oliver Sowerby

Location

Land North Of A507, West Of A10 Buntingford

Application type

Outline

Proposal

Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access

Recommendation

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

The Highway Authority recommends refusal of the planning application owing to concerns with respect to highway safety, traffic generation, road access and local and national policy.

Introduction

The Highway Authority note the submission of materials in support of the planning application, including a Transport Assessment (TA) prepared by transport consultant, "Jubb" dated May 2024.

The applicant seeks planning permission for the following development:

Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access.

The main site access is proposed from the A507 Baldock Road. The latter is Principal "A" class road and a main distributor road in the Hertfordshire roads hierarchy. A 60 m.p.h speed limit is in force on this section of Baldock Road.

A site access is also proposed from Throcking Lane to the north. The latter is an unclassified road and a local access road in the Hertfordshire roads hierarchy. A 60 m.p.h speed limit is in force on this section of Cottered Road/Throcking Lane.

Sustainability

The Highway Authority has some concern with respect to the sustainability of the proposed residential site. The Highway Authority seek compliance the key policies from the Local Transport Plan 4, namely Policy 1 and Policy 5, as reproduced below:

Policy 1: Transport User Hierarchy

To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:

- Opportunities to reduce travel demand and the need to travel
- Vulnerable road user needs (such as pedestrians and cyclists)
- Passenger transport user needs
- Powered two wheeler (mopeds and motorbikes) user needs
- Other motor vehicle user needs

Policy 5: Development Management

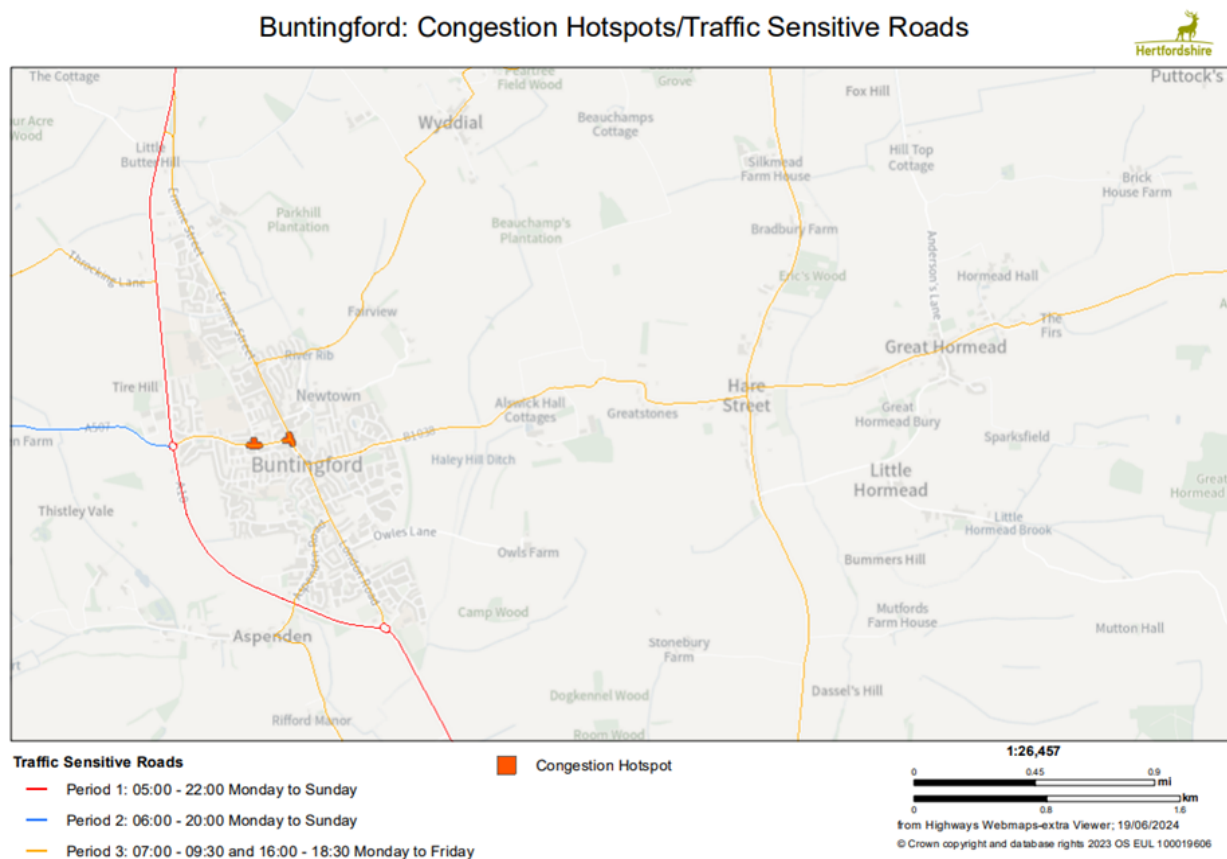
The county council will to work with development promoters and the district and borough councils to:

- a) Ensure the location and design of proposals reflect the LTP Transport User Hierarchy and encourage movement by sustainable transport modes and reduced travel demand.
- b) Ensure access arrangements are safe, suitable for all people, built to an adequate standard and adhere to the county council's Highway Design Standards.
- c) Consider the adoption of access roads and internal road layouts where they comply with the appropriate adoption requirements and will offer demonstrable utility to the wider public. Where internal roads are not adopted the county council will expect suitable private management arrangements to be in place.
- d) Secure developer mitigation measures to limit the impacts of development on the transport network, and resist development where the residual cumulative impact of development is considered to be severe.
- e) Require a travel plan for developments according to the requirements of 'Hertfordshire's Travel Plan Guidance'.
- f) Only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of the proposals.

- g) Resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users.
- h) Ensure new developments provide facilities for charging plug-in and other Ultra Low Emission vehicles, as well as shared mobility solutions such as car clubs.

In terms of transport, the Highway Authority note that new development should seek to comply with the adopted East Hertfordshire District Plan Policy TRA1 Sustainable Transport and the transport policies of the Hertfordshire County Council's Local Transport Plan 4 document.

The site's isolated location on the outskirts of Buntingford (extending into a rural area), in of itself a settlement that is noted to be poorly connected to neighbouring towns necessitates a robust approach to promoting sustainable travel and moreover examining in detail the impacts of vehicular trips, the latter being especially important in a heavily trafficked area with known congestion hotspots. The map below indicates traffic sensitive roads and congestion hotspots in the locality:



It is noted that the development has limited access to public transport.

The TA document notes that the closet bus stops are the stops named “Greenways” located on Baldock Road, east of the A10.

Paragraph 4.77 of the TA notes that *“that there is a regular bus service provision accessible from the site within the recommended walking distance to a bus stop (community facility) of 800m as set out*

in Manual for Streets (MfS). The proposed scheme also proposes improvements in this regard to encourage and facilitate the use of bus services.”

The Highway Authority does not concur with this conclusion, with an established benchmark of eight minutes' walk or 640m to a bus service being widely used nationally, although this notwithstanding, given the size of the site, a point taken at the centre would still necessitate a walk distance of more than 800m to the “Greenways” stops.

Paragraph 5.4.2 of the TA notes that *“Conversations with Arriva Group are currently taking place and more details on the public transport improvements will be provided in due course.”*

For the site of this site, located in an isolated location, the Highway Authority would expect a much more robust position with respect to bus services, given that a high quality bus services will be critical to sustainability. This should include discussions with the Highway Authority's Passenger Transport Unit. The Highway Authority would seek for a development of this nature that a bus service is provided to serve the site itself, with all dwellings located within 400m of a bus stop.

The Highway Authority must therefore conclude that the site is likely to be heavily reliant on the use of the private car and therefore contrary for Paragraphs 108 and 109 of the National Planning Policy Guidance.

Walking and Cycling

The Highway Authority note the importance of walking and cycling in order to ensure sustainable development and to minimise the use of the private car.

The TA puts forward the case that the site is accessible to most of Buntingford within 2km, although this does depend on where the centre point of the site is taken. Longer distances would be measured from the site's extremities.

In terms of improvements (on the site's southern frontage), the proposals seek to provide a walking/cycling link connecting the site with the existing provision which begins at the industrial estate. The Highway Authority has some concerns with the plans as presently submitted as no attendant lighting scheme is detailed. West of the A10, the pedestrian environment is also less conducive to walking. Under night time conditions, for example, the Highway Authority would consider that a walk from Buntingford town centre to the site somewhat challenging.

The applicant has also proposed a change in the speed limit on Baldock Road, although no supporting ATC data has been supplied. The Highway Authority has concern that without a substantial change to the environment on Baldock Road (for example, having an active frontage), will make compliance with the proposed speed limit challenging.

It is further noted from the TA, that similar proposals are put forward for Throcking Lane. *“It is also proposed to reduce the vehicle speed limit to 30mph for the section of Throcking Lane between the junction with the A10 and for the whole section leading to the site and along the link road. In addition, the 30mph speed designation would also extend west of the Throcking Lane access (i.e. the western approach to this junction”.*

The applicant has also not consulted in advance Hertfordshire County Council's Speed Management Group on the proposed change in accordance with our policy document.

Figures 5.6 to 5.8 detail the proposed mitigation for pedestrians and cyclists on Baldock Road in the direction of Buntingford town centre. It is noted that whilst cyclists have some benefit in terms of a LTN 1/20 style cycle route from the main site access to the Baldock Road/A10 junction, cyclists must join the main road east of the junction to route towards the town centre.

The applicant has also proposed a route which links two Rights of Way together (RoW 35 and 41) via a new footbridge over the A10. The Highway Authority is content that such a proposal (which would also need permission from HCC's Structures team), could form a secondary link into Buntingford. It is noted that the route's connection into Bowling Green Lane is not ideal in part, with the northern end of the lane not being in residential use which leads to doubts with respect to surveillance, lighting and attendant pedestrian safety. No mitigation has been proposed on Bowling Green Lane.

No detail is provided as to how the Rights of Way within the site are affected or could be utilised and improved to assist sustainable development. In this regard, consultation should be made with Hertfordshire County Council's Countryside and Rights of Way (CRoW) unit.

The Highway Authority has some concerns with respect to the scope of the mitigation package put forward in the TA document, notably an insufficient level of detail regarding the walking and cycling routes into Buntingford. To achieve a mode share as set out within the TA, exceptional measures need to be detailed to facilitate access to/from the site into Buntingford.

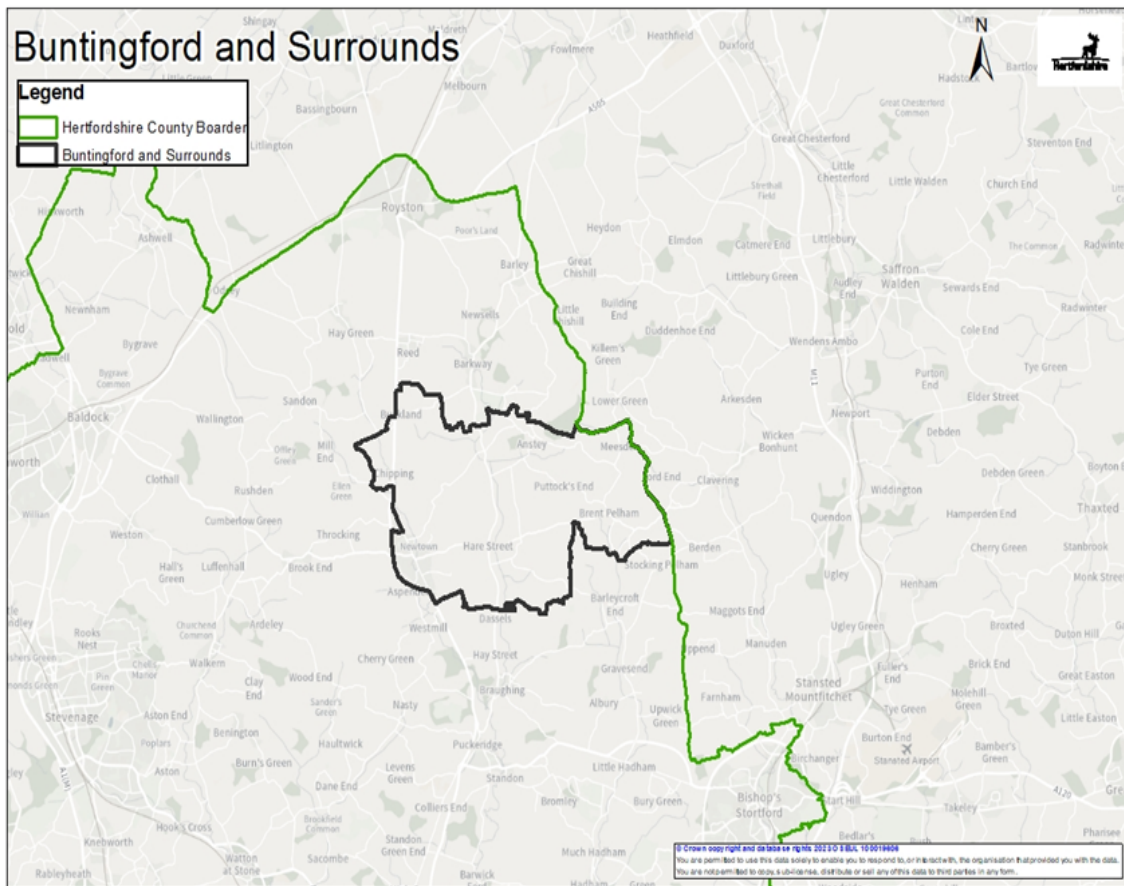
Trip Rates

The Highway Authority has some concern with the trip rate methodology as set out within the TA and therefore the attendant assessment robustness.

The Highway Authority has examined the potential mode share in more detail following a review of the TA. Examining mode share is an exercise which may be assessed using a number of different techniques, including using census data, National Travel Survey and/or mobile phone data.

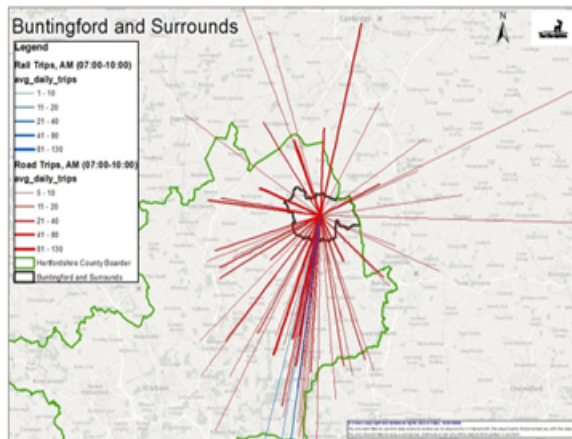
Mobile Phone Network Data

The Highway Authority regularly collects survey data across the County using a variety of assessment tools, one of which is the utilisation of mobile phone data which may be used to analyse journey patterns and distributions. Such an exercise has been undertaken for Buntingford, as shown in the area below:

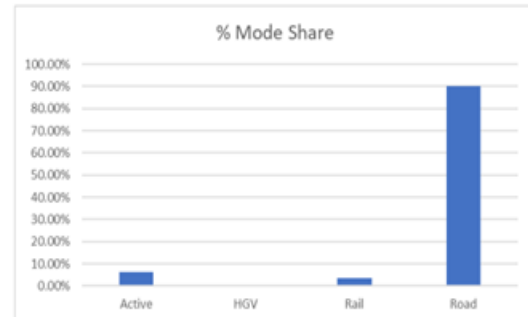


The mobile network data was collated over a three-month period, from 02/03/2023 to 25/05/2023. The data shown is for the AM Peak Period (APP) (07:00 – 10:00) and the PM Peak Period (PPP) (16:00 – 19:00).

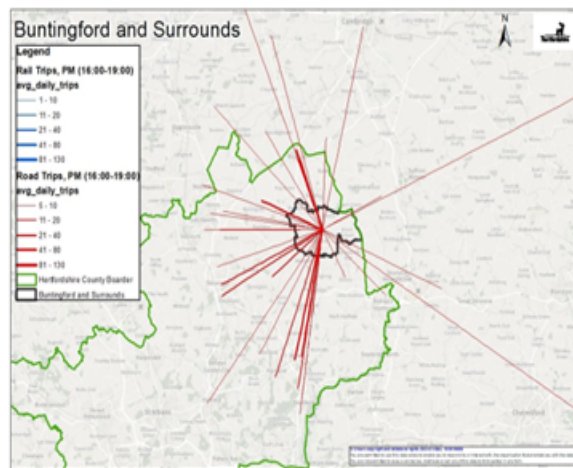
Car and Rail Trips Starting in Buntingford and surrounds, AM Period (07:00-10:00)



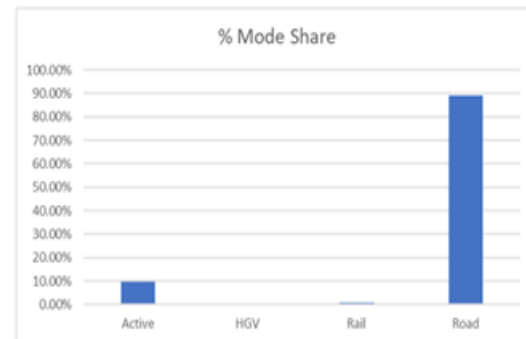
Mode Share	Average Trips	% Mode Share
Active	132	6.26%
HGV	7	0.33%
Rail	71	3.37%
Road	1898	90.04%



Car and Rail Trips Starting in Buntingford and surrounds, PM Period (16:00-19:00)



Mode Share	Average Trips	% Mode Share
Active	131	9.76%
HGV	5	0.37%
Rail	11	0.82%
Road	1195	89.05%



It can be seen from the above MND tables that there is illustrated a 90% share of person trips by car in the AM and PM periods. Active modes (walking, cycling and bus), are less than 10% in the AM and PM peak periods respectively.

It is noted that these trips have common origins/destinations which include the following destinations:

- Cambridge;
- Royston;
- Ware;
- Hertford;
- Letchworth Garden City; and
- Stevenage.

The Highway Authority notes that the transport consultant has used a methodology for establishing a car driver trip rate from TRICS. However, in this instance, it may be more fitting to utilise a Total People rate from TRICS and then conduct appropriate refining techniques which are able to reflect a more locally derived pattern.

The assessment has also assumed reductions in vehicular trip rates (to the TRICS rates) which are not considered reflective of the site's characteristics and moreover the limited mitigation which has been presented within the TA.

The significant reductions to the vehicular trip rates are not considered apposite to account for the relatively limited mix of uses within the proposed development

The TA goes on to state in paragraphs 6.3.22 and 6.3.23 cites evidence from the Department of Transport paper regarding Travel Plans.

6.3.22 *“Case Studies reviewed by the Department of Transport as part of the research paper titled ‘Smarter Choice Document – Changing the way we travel’ published in 2005, indicates that an average 18% reduction in private car use can be delivered through an effective Travel Plan.”*

6.3.23 *“In light of the above, it is reasonable to assume that by delivering appropriately sustainable travel infrastructure as well as targeted Travel Plan measures, a mode shift of 15% away from car usage can be achieved.”*

The Highway Authority is unable to accept such a high figure based on the site’s locational characteristics and the mitigation put forward within the TA. For example, the feasibility of improvements, such as a continuous LTN 1/20 compliant cycle route into Buntingford is limited. A bus route, which should be a high quality, shuttle style service is likely to be required, whilst the TA only points to speculative conversations with a bus route as opposed to auditable proposals.

Buntingford is furthermore only a small town, with limited local facilities, services and employment, having grown significantly in recent years from a far smaller settlement. The evidence suggests high usage of private vehicles by residents of Buntingford. Whilst the Highway Authority may be willing to accept reasonable reductions for internalisation on the site, for example, for on-site education facilities or modest discounts for local shops, it is clear that the transport consultant has projected factors which are out of keeping with the site’s location and mitigation proposals.

The Highway Authority therefore has no confidence in this exercise and therefore the attendant assessment of the highways impact.

Assessment/Modelling

For a site of such a size, the Highway Authority would have expected engagement with the Highway Authority before undertaking a modelling exercise. This site is considered a strategic development and therefore it is normally fitting to explore with the Highway Authority the usage of the County’s strategic transport model or other alternatives depending on the circumstances.

The Highway Authority’s transport models are explained by way of reference to the following

Hertfordshire County Council webpage:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/transport-modelling/transport-modelling-in-hertfordshire.aspx>

Given that there are concerns with the specificity of the trip generation exercise, detailed comment will be reserved until the transport consultant has undertaken a revised assessment. However, without full examination of the key junctions (also at a strategic assessment level), providing access in and out of Buntingford, it is considered that the proposed housing growth could precipitate a "severe" impact on the local highway network.

Access Proposals

The Highway Authority note the principal access junction to be taken from the site’s southern boundary on Baldock Road. As noted previously within this response, the Highway Authority seeks

that the applicant engages with our Speed Management Group with respect to the feasibility of changing the speed limit.

However, the site's access point onto an "A" classified road automatically necessitates a referral to Hertfordshire County Council's Strategic Transport Issues Board (STIB). The Highway Authority's policy is generally to resist new access points onto "A" roads, and as such, requires that promoters of developments bring their proposals to STIB in order to ensure scrutiny by senior officers. This site should therefore be brought to STIB at the earliest opportunity.

The site access proposals will require a Stage 1 Road Safety Audit, in addition to the A10/Baldock Road where a Toucan crossing is proposed.

Summary

The Highway Authority notes the proposals for a development of some 600 homes plus supporting mixed-use uses and infrastructure.

The development, a very substantial site is located away from the fringe of the urban area in open fields to the west of Buntingford.

In terms of accessibility, this response has raised concerns with respect to sustainability, with the mitigation proposed unlikely to prevent a very high mode share attributed to the private car. The TA has not in any satisfactory way addressed how public transport could be utilised to assist in making the site sustainable.

Whilst some walking and cycling mitigation measures are proposed and duly welcomed, it is considered that these could be further developed. The provision of high quality active travel links into Buntingford is of key importance.

This response has raised concerns with respect to the trip generation exercise with attendant issues with the modelling exercise. With respect to the latter, engagement will be needed with Hertfordshire County Council's modelling team.

In summary, the Highway Authority recommends refusal of the planning application owing to concerns with respect to highway safety, traffic generation, road access and local and national policy.

Signed
Oliver Sowerby

19 June 2024