

Land North of A507, West of A10 Buntingford

784-B077665

Summary PoE of Peter Blair on Sustainability and Accessibility from a Highways and Transportation Perspective updated to reflect NPPF August 2026

In Respect of 'Outline planning application for development of up to 600 dwellings (C3), up to 60 units of 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 bridges over the A10, with all matters reserved except for access.'

At Land North of A507, West of A10 in Buntingford

Date: 24/08/2026 | Tetra Tech Ref: 784-B077665

PINS Ref: 6008238 | LPA Ref: 3/24/0966/OUT

Final

On behalf of Hallam Land Management Ltd

Volume 3: Summary Proof of Evidence



TETRA TECH

Document Control

Document:	Summary PoE of Peter Blair on Sustainability and Accessibility from a Highways and Transportation Perspective updated to reflect NPPF August 2026
Project:	Land North of A507, West of A10 Buntingford
Client:	Hallam Land Management Ltd
Project Number:	784-B077665
File Origin:	Y:\784-B077665_Buntingford_Appeal\60_Output\61_WIP\6103_Reports\PoE

Revision:	02	Prepared by:	P Blair
Date:	24/08/2026	Checked by:	M Connolly / M Thompson
Status:	Final	Approved By:	P Blair

1.0 Introduction

1.1 Preamble

- 1.1.1 This Highways and Transport Summary Proof of Evidence describes my Highways and Transport evidence, considerations and findings, focusing on the areas of Sustainability and Accessibility. This Summary has been updated following a request from the Inspector to update evidence following the publication of the August 2026 NPPF.

1.2 Experience of Witness

- 1.2.1 My name is Peter Blair. I have a degree in Civil Engineering and a diploma in Industrial Studies, both from the University of Ulster. I am a Chartered Engineer, a Fellow of the Institution of Civil Engineers and a Fellow of the Chartered Institution of Highways and Transportation.
- 1.2.2 I am Head of Transport North at the international consultancy Tetra Tech (TT). I have over 35 years' experience of working in the field of traffic engineering, acting both for Public Authorities and Private Clients.
- 1.2.3 I am familiar with the development site and the highways, transport and active travel conditions in the local area.
- 1.2.4 My evidence is given in accordance with the requirements of my professional bodies. I can confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

1.3 Appointment

- 1.3.1 I am instructed on behalf of Hallam Land Management Ltd, thereafter referred to as the appellant, to present evidence relating to the sustainability and accessibility aspects of Highways and Transportation matters in respect of the appeal, submitted pursuant to Section 78 of the Town and Country Planning Act 1990, concerning development of Land North of the A507 and West of the A10 in Buntingford ("the appeal site").

2.0 Summary Proof of Evidence

2.1 Summary

- 2.1.1 My Proof of Evidence relates to the accessibility and sustainability of the proposals, both of which are points of contention within the Reasons for Refusal and are outlined within the Inspectors Main Issue (ii). I have also now considered the additional point raised by the Inspector pursuant to the recent publication of the NPPF, i.e the tests in NPPF Policy S5(j) and whether there are policies which would suggest refusal of the application.
- 2.1.2 I have entered into a joint Highways Statement of Common Ground with Ridge, the Local Highway Authority (Hertfordshire County Council) and the Local Planning Authority (East Herts District Council). Many points have been agreed, including:
- There are facilities within Buntingford accessible within a 2km walking distance from the centre of the proposed site;
 - Enhancements to RoWs 35 and 36 will provide benefits to existing and future residents of Buntingford and the development;
 - The enhancements to public transport arising from the proposals will enhance accessibility by bus for development users and existing trip making;
 - Zero and Ultra-low emission vehicles are a sustainable mode of transport. The development will facilitate the use of these vehicles through providing charging facilities in accordance with standards;
 - The modal shift targets set out in the Framework Travel Plan suggest that a reduction in the reliance on the private car is achievable; and
 - It is agreed that the traffic impact related tests in the NPPF are satisfied by the proposals.
- 2.1.3 On that latter point, The NPPF has been updated as of 17th August, but the traffic impact tests are substantially the same.
- 2.1.4 The matters not agreed relating to sustainability and accessibility are addressed within my evidence.
- 2.1.5 The Planning Statement of Common Ground describes the most important policies in terms of determining this appeal, and the fact that they should be given reduced weight due to the Council being unable to demonstrate a 5-year supply of deliverable housing sites. I leave the weighing and attributing of weight in relation to each policy to the Planning Professionals and the Inspector but note this agreed position as relevant context.
- 2.1.6 I have reviewed the connectivity of the site using the DfT's Connectivity Tool, which by definition "*generates a national measure of connectivity for any location in England and Wales. The connectivity score measures people's ability to get where they want to go.*"
- 2.1.7 My review found that the Appeal site at present, has a connectivity score of 45 for all modes except driving. Applying guidance from the DfT, this means that the site is 45% as connected as the most connected area of England and Wales (Tower Hamlets in Central London). A more

localised comparison of the appeal site against other areas within East Hertfordshire shows that the site is categorised as Band B in a 10-tier banding scale from A to J (with A being the most connected), i.e. the appeal site is located within the second highest banding of connectivity in the district. The site also has a connectivity score of 71 by driving. This demonstrates the excellent connectivity by road which the site benefits from, which assists sustainable car journeys, taxis, public transport, deliveries and emergency services. Those scores will be further enhanced under the proposals.

- 2.1.8 The site is located adjacent to the BUNT3 Employment allocation in the East Herts District Plan. The District Plan defines the location of that allocation as being sustainable. Given that the appeal site will additionally deliver infrastructure in terms of active travel, public transport, facilities on site and safe and suitable access, I consider that the appeal site location, is (and can be made) sustainable in travel terms.
- 2.1.9 In addition to the BUNT3 allocation, there is a current application (Ref: 3/25/1986/FUL) for the erection of four light industrial units with associated parking on the Buntingford Business Park site, which is adjacent to the appeal site. Those proposals do not propose any off-site active travel improvements to existing pedestrian or cycle infrastructure. Whilst that application is undecided, the LHA have not objected to the proposals, and in their consultation response comment that the site benefits from a footway connection into Buntingford. That connection will be enhanced for pedestrians and cyclists as part of the appeal site proposals, and the existing uncontrolled A10 crossing will also be enhanced with a toucan crossing facility.
- 2.1.10 To consider the subject of reliance on the private car I have reviewed trip rates for all residential sites across England and Wales, excluding London. My review shows that residential developments in all locational categories would generate car traffic to a broadly similar extent. I have also undertaken a more localised check by reviewing the journey to work census statistics for the areas in which the site is located and for East Hertfordshire as a whole. Those vehicle driver percentages are 69% and 62% respectively. The proposals can hardly be criticised in terms of reliance on private car, when practically all residential sites exhibit car use and it is located in an area which exhibits similar levels of car use to the district average. Moreover, the purpose of the travel plan and active travel improvements is to reduce that position further.
- 2.1.11 The on-site layout of the proposed development is a matter for detailed design, and it can be ensured that it is designed to modern standards to prioritise pedestrians, cyclists and public transport users. The proposals include facilities on-site which offer future residents a reduced need to travel off site, for day-to-day retail needs, and potentially for education/escort education journey purposes. Connections to those facilities will be safe and suitable for all users. A further reduced need to travel is enabled through the provision of modern and efficient broadband, which provides access to work, retail, entertainment social engagement and services.
- 2.1.12 Safe and suitable access will also be provided onto the site. There are two safe and suitable vehicular access junctions, and three active travel access locations. The proposed site will

- benefit from an all-modes roundabout, 2 pedestrian footbridges and a new active travel bridge, suitable for pedestrians and cyclists.
- 2.1.13 It is agreed by all parties that services and facilities within Buntingford are accessible within a 2km walking distance of the site. My review has identified 45 existing facilities and services within that catchment. These include leisure, retail, employment and education facilities. All facilities and services within Buntingford will be accessible within a 5km cycle catchment.
- 2.1.14 The proposals provide four key active travel routes from the site to Buntingford. This includes providing a 4m wide shared foot/cycleway on the northern side of the A507, connecting to an improved 3m shared foot/cycleway on Baldock Road via a new toucan crossing facility across the A10. The proposals promote a traffic speed reduced and street lit environment along that route. Two additional routes are available via the upgraded existing footbridge and proposed active travel bridge. These provide an unconflicted crossing of the A10, and connect with Skipps Meadow (a naturally surveilled, residential street suitable for walking and cycling) and RoW 36, which the proposals will upgrade. The fourth route is via the proposed footbridge across the A10, connecting with RoW 35. This route is suitable for many pedestrians and offers a significant improvement on the existing situation where no crossing facilities are provided across the A10 between RoW 35 and 41. RoW 35 will also be enhanced.
- 2.1.15 The four routes connect to the primary and secondary walking and cycling network as identified in the LCWIP. The proposed active travel infrastructure and mitigations serve to improve key routes identified in the East Herts Local Cycling and Walking Infrastructure Plan (LCWIP) and Hertfordshire's Public Rights of Way Improvement Plan (RoWIP).
- 2.1.16 In addition to the multiple sustainable improvements and measures as set out in my PoE Appendix J, as the S106 and conditions discussions have progressed, the Appellant has requested that an additional potential enhancement be drawn up to improve the walking route to Millfield First School. That is to improve the existing facilities for pedestrians to that school, prior to a school being provided on site (evidence of Mr J Duffy, Appendix M).
- 2.1.17 As the school provision point has not yet been concluded, those potential enhancements do not feature in my PoE Appendix J matrix of sustainable improvements, nor have they informed my considerations on the acceptability of the proposals.
- 2.1.18 It is clear however, that if those enhancements are delivered, they would improve the walking environment between Baldock Road and Millfield First School for pedestrians from the development and for existing trip making.
- 2.1.19 I have reviewed crime statistics within Buntingford between 2020-2025, which shows no recorded crime on RoW36, between the bridges over the A10 and Bowling Green Lane. The improvements involved resurfacing, widening, maintenance and lighting which can be delivered through a number of mechanisms. The appellant is also keen to provide funding towards allowing the authorities to make the necessary application to change the designation of the footpath to allow for cyclists. Should any user not wish to travel to Buntingford via the PRow network, there are alternative, surfaced route choices via the A507 and Baldock Road
-

- which will be overlooked by a main highway and street lit, and also via the residential street of Skipps Meadow which offers natural surveillance from housing and is street lit.
- 2.1.20 With regards to public transport accessibility, there will be two onsite bus stop facilities, (one at a travel hub) which will ensure all residential dwellings are within 400m of a bus stop. Existing bus services 331, 18 and 37 will be diverted onto the site and a financial contribution of £1.5m will be made by the appellant to run the service 331 at a 30-minute frequency. These buses provide future residents with access to Buntingford, as well as Royston, Hertford and Stevenage amongst other towns and villages within reasonable journey times. It is agreed in the HSoCG that residents of the proposed development will have the option to travel sustainably to other nearby towns, local facilities and employment centres by bus. HCC have identified timetabling and routing improvements for the future services.
- 2.1.21 Hertfordshire County Councils Demand Responsive Transport (DRT) service, HertsLynx service, will also be available on site and the LHA have confirmed that a financial contribution towards this service is not required. The appellant is contributing £500 per dwelling towards improving and maintaining the Buntingford Community Transport Scheme, for use of future residents. The BCAT and HertsLynx services, along with existing and improved bus services, provides access to employment, large supermarkets and comparison shopping located in towns and villages outside of Buntingford.
- 2.1.22 I have compared this Appeal case with a recent Appeal decision in Langho, Ribble Valley, a case with very similar attributes in which I was involved. The inspector in that case found:
- Acceptance that appropriate access, rather than ideal / high-quality access, is the appropriate test;
 - Acceptance that constrained access by some modes for some residents is not incompatible with the test of requiring safe and suitable access for all, including the mobility impaired;
 - Acceptance of travelling to further destinations by bus to access key facilities;
 - Acceptance that mitigation doesn't need to fully resolve shortcomings;
 - Acceptance that whilst not ideal, the development offered a range of transport options and so was not reliant on private car; and
 - That the proposals had an acceptable effect on sustainable modes and patterns of transport (which was the specific test the Inspector set at the CMC) and that the proposals were in accordance with the Framework.
- 2.1.23 The Inspector took a realistic view and confirmed that the test should be whether facilities are generally appropriate, not ideal.
- 2.1.24 Whilst the two cases are similar in many respects, I consider that accessibility and sustainable travel credentials are better at the Appeal site than was the case in the Langho appeal.
- 2.1.25 I have reviewed the proposals against the cited policy conflicts named within the RfR, including cited conflicts with the previous NPPF, East Herts District Plan, Hertfordshire's Local Transport Plan and Buntingford Community Neighbourhood Plan. I have also reviewed the proposals
-

against other relevant policy, including the NPPF Draft and now the August 2026 NPPF. My evidence demonstrates that the proposals are not in conflict and indeed accord with the relevant travel and transport related policies.

2.1.26 I have reviewed the mode shift targets as set out within the Framework Travel Plan, and my evidence shows that if offset evenly, an uptake of 53 daily pedestrian, cycle, public transport and car sharing trips respectively across a 12-hour period would be required to achieve a 15% reduction in unsustainable car trips. My evidence concludes the targets are suitable, realistic and will be achieved. I also consider that they will be significantly bettered with the increasing shift to sustainable car travel.

2.1.27 I have reviewed the proposals against the points of contention within the Inspectors Main Issue and the Reasons for Refusal. In considering those points, my evidence has shown that:

- The development is proposed in a sustainable location, and accessibility will be improved further;
- The proposals provide convenient access, for all users, by a range of sustainable travel modes, giving access to a range of local facilities and services, employment and food/comparison shopping further afield;
- There are socially safe routes between the site and Buntingford;
- The proposals provide modern and safe pedestrian and cycling routes between the site and Buntingford;
- That the proposed active travel connections and bus improvements will make a suitable modal shift towards reducing car usage, and that the modal shift targets are realistic and achievable;
- The site is physically well related to the settlement, not isolated or severed from Buntingford; and
- Users of the site will not be unacceptably reliant upon the private car, and that many forms of vehicle trips are in fact sustainable. If a level of car use is held to amount to a “reliance” upon the car, then that is a typical situation, to be expected in almost all developments across the UK.
- In relation to the NPPF policies which relate to transport and which say that proposals should be refused if they are not compliant, i.e DP3 (3), and TR6 (4), I consider that the proposals are not in conflict with any Transport or Accessibility policy which would warrant a refusal.

2.1.28 In transport terms, the proposals are accessible and sustainable and the increasing prevalence of sustainable vehicles and the reducing need to travel, along with the provision of on-site facilities, modern active travel infrastructure, high level of bus accessibility, and promotion of sustainable travel within the Travel Plan, all align with vision-led aspirations for a sustainable and accessible development.

3.0 Conclusions

3.1.1 In consideration of my evidence, I conclude the following:

- The site is sustainable;
- The site in its existing form is well connected, and that connectivity will be enhanced by the proposals;
- The proposals provide safe and suitable access for all modes of travel;
- The proposals prioritise, encourage and provide for sustainable transport journeys on foot, by cycle, by bus travel and by sustainable vehicles.
- Bus, highway, cycle and pedestrian improvements and contributions have been developed in conjunction with the authorities and are appropriate;
- The improvements additionally serve to deliver LCWIP and ROWIP objectives and will improve conditions and encourage sustainable travel from the existing population too.
- The development offers a reduced need to travel through providing digital connectivity and onsite facilities.
- Residents will not be reliant on the private car, and a genuine choice of travel has been provided including walking, cycling and public transport;
- The site is physically well related to the Settlement and not isolated or severed from the town of Buntingford in terms of trip making. The proposals comply with national and local policy;
- The proposals are not in conflict with any NPPF transport or accessibility criteria which would warrant a refusal.
- The proposals offer a socially safe active travel connection between the site and Buntingford.
- The Mode shifts identified in the FTP are realistic, will be achieved and will be bettered in recognition of the quickly reducing presence of unsustainable private vehicles.

3.1.2 I conclude that the development proposals should be considered to be acceptable in terms of travel and transport accessibility and sustainability.