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SAFETY [TEXT DOCUMENT
UPDATED FOLLOWING NPPF
UPDATE]

LAND NORTH OF A507 AND
WEST OF BUNTINGFORD

HALLAM LAND MANAGEMENT
August 2026

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NPPF UPDATE]
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HALLAM LAND MANAGEMENT

August 2026

Prepared for
Hallam Land Management

Prepared by
Ridge and Partners LLP

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1. EXECUTIVE SUMMARY

- 1.1.1. My name is James Michael Duffy. I am an Associate Director Transport Planner at Ridge Partners LLP (as acquirers of Jubb Consulting Engineers). Ridge is a multi-disciplinary consultancy with a team of specialist transport planners. I have a BSc Honours Degree in Geography from Plymouth University and a Post Graduate Diploma/MSc in Urban Planning at Oxford Brookes University. I am a member of the Chartered Institution of Highways and Transportation. I have worked in the field of transportation planning for 25 years. In this time, I have worked as a consultant providing advice on transport and highways issues associated with a wide range of schemes in the public and private sector.
- 1.1.2. Jubb (now Ridge) was commissioned by the Appellant (Hallam Land Management) to provide transport planning advice in relation to a proposed residential led development on Land North of A507 and West of A10 Buntingford (referred to as “the Site” throughout this Proof of Evidence) in 2023.
- 1.1.3. The planning application was registered and validated by East Hertfordshire District Council (EHDC) on the 28th May 2024 under reference 3/24/0966/OUT. The description of the ‘Proposed Development’ is as follows:
- “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 save for access.”*
- 1.1.4. To note this description has been amended to include the unit numbers for elderly accommodation and to add a plural indication (i.e. ‘pedestrian bridges’) on the basis that two additional active travel bridges will be provided. This change is just for clarification purposes and does not represent a change from the development assumptions as assessed in transport documentation submitted as supporting information during the course of this application and as part of this appeal.
- 1.1.5. The Proposed Development was refused at planning committee on the 24th October 2025 based on four identified Reasons for Refusal, including matters specifically related to highways and transportation as identified in Reason for Refusal (RfR) 1. In this regard I have been appointed by the appellant as an expert witness considering matters of ‘Vehicle Access and Highway Safety’. Furthermore, separate to my appointment, Peter Blair (Head of Transport North at Tetrattech) has been appointed by the appellant to cover matters of ‘Sustainable Transport / Accessibility’ and therefore a response covering this topic will be provided in his evidence.
- 1.1.6. RfR 1 states the following:

*“Due to its siting, the proposals would be isolated and physically severed from the rest of Buntingford by the A10, with poor quality active travel connections to services within the town. As such the proposals are likely to be car dependent and **result in increased vehicle trips and pressure upon the highway network [my emphasis]**. The proposals represent an unsustainable form of development and residents and visitors would be heavily reliant on the private car to access employment, main food and comparison shopping elsewhere. The proposals fail to provide a*

genuine choice of alternative travel modes and would not amount to sustainable development (in accordance with the NPPF) and would result in a form of development outside of the settlement boundary that amounts to a significant conflict with the Development Strategy within the District Plan and objectives of the Buntingford Community Area Neighbourhood Plan. The proposal would be contrary to Policies DPS2 and TRA1 of the East Herts District Plan (2018), policy HD1 of the Buntingford Community Area Neighbourhood Plan and paragraphs 110 and 115 National Planning Policy Framework.”

- 1.1.7. As I have set out within this PoE, significant consultation has been undertaken throughout the timeline of the application for the Proposed Development with Hertfordshire County Council (HCC) Local Highway Authority (LHA), who manage the HCC transport network. In addition, numerous submissions have been made to the LHA providing details of the proposed transport strategy, which has been refined during the course of the application. Furthermore, details of offsite assessment and mitigation have been provided as and where required.
- 1.1.8. Extensive engagement with the LHA has resulted in the Appellant and the Council and LHA reaching broad agreement in relation to the technical submission relating to the Proposed Development with the main point of outstanding objection raised by the LHA now being the location of the development in relation to the A10 (i.e. as a point of principle). In this regard the LHA has confirmed that the location of the site in relation to the A10, would, in their view, result in reliance on the private car. Thus, in reference to policy 5 (f) of the Local Transport Plan, included as Core Document (**CD**) Reference **10.3**, the LHA have queried whether there are ‘special circumstances’ that would justify access to the A507. Policy 5 states that “*the county council will work with development promoters and the district and borough councils to:...(f) only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of the proposals.*”
- 1.1.9. As discussed above, Peter Blair’s proof of evidence outlines how sustainable access can be achieved both over the A10 and into Buntingford. Furthermore, as I have set out in my PoE, the proposed development would not result in significant impact on the A507, as was agreed in the signed Highways Statement of Common Ground (HSoCG) as made between the appellant, EHDC, and the LHA (**CD 15.3**), and therefore I would query whether special circumstances are necessary, particularly when considered that access has been permitted on other higher order roads elsewhere in Hertfordshire. Moreover, I would also query the mention of vehicle impact in RfR 1 and assume that this is a position that is resolved.
- 1.1.10. To note, whilst brief mention was made to A10 crossing concerns in the final response from the LHA (**CD 4.42**) in September 2025 (i.e. following more detailed comment in relation to the employment application discussed further below), no specific reference to highway safety concern have been raised in the subsequent reasons for refusal. In fact, the Delegated Officer Report (**CD 6.2**) makes it clear that the LHA confirm that technically safe access is achieved as confirmed in the following paragraph:

“... The Highways Authority have now accepted that the proposed access could be achieved without undue harm to highway safety. As such the proposals are broadly in accordance with policy TRA2 in terms of highways impacts, although the conflict with the Hertfordshire Transport Plan is noted.”

- 1.1.11. Notwithstanding this, EHDC has made specific reference in paragraph 5.13 of their SoC (**CD 6.3**) in relation to concerns with regards to the proposed at grade Toucan crossing on the A10:

“There are significant unresolved concerns regarding the operation, design, and highway safety of the proposed A10 toucan crossing. The findings of the most recent Road Safety Audit highlight persistent doubts about whether a safe and secure crossing can be successfully delivered at this location. In particular the location of a signalised surface crossing close to the A10/ A507 roundabout on the trunk road network as well as the effectiveness of localised speed reduction are not considered acceptable in highway safety terms. As such, the proposal is considered to be contrary to the objectives of the Local Transport Plan and East Hertfordshire District Plan Policy TRA2, as well as paragraphs 115, 116, and 117 of the National Planning Policy Framework.”

- 1.1.12. It is understood that this comment, which incorrectly identifies the A10 as part of the trunk road network, has been raised in consideration of RfR 1 related to the employment proposals (application reference 3/24/1255/OUT) also brought forward by the appellant, and which Ridge (as acquirers of Jubb) have also provided transport consultancy in relation to. These employment proposals, if consented, would share the same point of access (a roundabout) on Baldock Road, and by extension, would also benefit from the same active travel enhancements connecting into Buntingford to include the A10 crossing. These proposals were refused on the 6th May 2026 with RfR 1 providing specific reference to highways and transportation and summarised as follows:

*“Due to its siting and location, the proposals would be isolated and physically severed from the rest of Buntingford by the A10, with poor quality and unsafe active travel connections to the town. **The provision of a signal-controlled crossing, at grade, located on the A10 in close proximity to the Baldock Road (A507/A10) roundabout due to its current road geometry, the characteristics of the traffic flows and unpredictable operation (of signalling) would create an unsafe environment for pedestrians, cyclists and other highways users. As such the proposals represent an unsustainable and unsafe form of development and would not be acceptable in highway safety terms.** The proposals would not provide a genuine choice of alternative travel modes, would not ensure that safe and suitable access can be achieved for all users and would not amount to sustainable development (in accordance with the NPPF). The development would also result in a form of development outside of the settlement boundary, which in addition to the above harm identified, amounts to a significant conflict with the Development Strategy within the District Plan and objectives of the Buntingford Community Area Neighbourhood Plan. The proposal would be contrary to Policies DPS2, ED1, TRA1 and TRA2 of the East Herts District Plan (2018), policy BE2 of the Buntingford Community Area Neighbourhood Plan, policies 1 (The Transport Users Hierarchy) and 5 (Development Management) of the Hertfordshire County Council Local Transport Plan 4 (May 2018)), and paragraphs 110 and 115 National Planning Policy Framework). (emphasis added)”*

- 1.1.13. As I have set out in this PoE the proposed access strategy has been developed to ensure safe access for all modes and in consideration of discussions with the LHA. Furthermore, this access strategy (inclusive of the at grade A10 crossing) has been subject to Road Safety Audit (RSA), using an approved and independent safety auditor and based on a brief previously agreed with the LHA, with no safety issues identified. Thus, whilst the LHA / EHDC have queried the acceptability of the RSA I consider this unfounded on the basis that the auditor was agreed and they have followed the prescribed brief. Moreover, as I have set out in my PoE, where design suggestions

have been raised in this audit these have either been adopted in subsequent design iterations or are of the manner that can easily be dealt with at detailed design stage.

- 1.1.14. I have also set out in my PoE that this type of at grade crossing on the A10 is common across the UK including at more major road connections. Furthermore, whilst the LHA have raised further comment (again in detail in response to the employment proposals and not the proposed development specifically) with regards to the position of the crossing and approach speed limit, the comments raised have not been identified as an issue by independent road safety audit. Moreover, I consider these to be a minor point in any case given the fact there is significant highway land around the crossing should the LHA prefer it to be repositioned, and the speed change on the A10, was introduced following request from the LHA and is not a necessary design requirement. Furthermore, on that point further designs have been submitted to the LHA to demonstrate this flexibility, as part of this appeal process, and these have been subject to further safety audit that have also identified no safety issues.
- 1.1.15. In this regard, based on the evidence in this PoE, I consider there are no Highway Access and Safety reasons to reject the appeal.

2. QUALIFICATION AND EXPERIENCE

- 2.1.1. My name is James Michael Duffy. I am an Associate Director Transport Planner at Ridge Partners LLP (as acquirers of Jubb Consulting Engineers). Ridge is a multi-disciplinary consultancy with a team of specialist transport planners. I have a BSc Honours Degree in Geography from Plymouth University and a Post Graduate Diploma/MSc in Urban Planning at Oxford Brookes University. I am a member of the Chartered Institution of Highways and Transportation. I have worked in the field of transportation planning for 25 years. In this time, I have worked as a consultant providing advice on transport and highways issues associated with a wide range of schemes in the public and private sector.
- 2.1.2. I have provided transport and highways advice regarding this Proposed Development since 2023 and have been on site on a number of occasions including during the network peak periods and during other times of the day; I am familiar with the local surroundings and conditions.
- 2.1.3. The evidence that I have prepared and provided for this appeal in this Proof of Evidence (PoE) is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

3. PURPOSE AND SCOPE OF EVIDENCE

3.1. Introduction

3.1.1. In 2023 I was commissioned by the Appellant (Hallam Land) to provide transport planning advice in relation to a proposed residential led development on 'Land North of A507, West of A10 Buntingford' (referred to as "the Site") throughout this PoE.

3.1.2. The planning application was registered and validated by East Hertfordshire District Council (EHDC) on the 28th May 2024 under reference 3/24/0966/OUT. The description of the 'Proposed Development' is as follows:

"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 save for access."

3.1.3. To note this description has been amended to include the unit numbers for elderly accommodation and to add a plural indication (i.e. 'pedestrian bridges') on the basis that two additional active travel bridges will be provided. This change is just for clarification purposes and does not represent a change from the development assumptions as assessed in transport documentation submitted as supporting information during the course of this application and as part of this appeal.

3.1.4. The Proposed Development was refused at planning committee on the 24th October 2025 based on four identified reasons for refusal, including matters specifically related to highways and transportation as identified in Reason for Refusal (RfR) 1. In this regard I have been appointed by the appellant as an expert witness considering matters of 'Vehicle Access and Highway Safety'. Furthermore, separate to my appointment, Peter Blair (Head of Transport North at Tetrattech) has been appointed by the appellant to cover matters of 'Sustainable Transport / Accessibility' and therefore a response covering this topic will be provided in his evidence.

3.1.5. RfR 1 states the following:

*"Due to its siting, the proposals would be isolated and physically severed from the rest of Buntingford by the A10, with poor quality active travel connections to services within the town. As such the proposals are likely to be car dependent and **result in increased vehicle trips and pressure upon the highway network [my emphasis]**. The proposals represent an unsustainable form of development and residents and visitors would be heavily reliant on the private car to access employment, main food and comparison shopping elsewhere. The proposals fail to provide a genuine choice of alternative travel modes and would not amount to sustainable development (in accordance with the NPPF) and would result in a form of development outside of the settlement boundary that amounts to a significant conflict with the Development Strategy within the District Plan and objectives of the Buntingford Community Area Neighbourhood Plan. The proposal would be contrary to Policies DPS2 and TRA1 of the East Herts District Plan (2018), policy HD1 of the Buntingford Community Area Neighbourhood Plan and paragraphs 110 and 115 National Planning Policy Framework." (emphasis added)*

- 3.1.6. To note it has already been agreed in paragraph 8.2 of the Highways Statement of Common Ground (HSoCG), included as Core Document (CD) Reference **15.3**, that traffic impact on the network has been assessed in detail based on an accepted model and does not show significant impact. On this basis I consider that it is not appropriate to respond in detail on this RfR (i.e. in relation to 'Access and Road Safety') as it has been agreed that the proposed development would not put pressure on the network. Moreover, further phasing sensitivity test modelling as set out in my PoE continues to demonstrate this. Notwithstanding this, a response on this in relation to 'Sustainability Transport / Accessibility' will be provided in Peter Blairs PoE.
- 3.1.7. In addition, it is understood, based on previous consultation and paragraph 9.12 of the HSoCG (i.e. in Matters Not Agreed), that the LHA and EHDC has concerns regarding the introduction of an additional A road access (i.e. onto the A507), as a point of principle, and therefore I have responded on this.
- 3.1.8. Furthermore, whilst no specific safety concerns have been raised as a RfR, EHDC has raised the following point in paragraph 5.13 of their SoC (**CD 6.3**):

"There are significant unresolved concerns regarding the operation, design, and highway safety of the proposed A10 toucan crossing. The findings of the most recent Road Safety Audit highlight persistent doubts about whether a safe and secure crossing can be successfully delivered at this location. In particular the location of a signalised surface crossing close to the A10/ A507 roundabout on the trunk road network as well as the effectiveness of localised speed reduction are not considered acceptable in highway safety terms. As such, the proposal is considered to be contrary to the objectives of the Local Transport Plan and East Hertfordshire District Plan Policy TRA2, as well as paragraphs 115, 116, and 117 of the National Planning Policy Framework."

- 3.1.9. This safety concern is maintained by the LHA / EHDC in the matters not agreed section of the HSoCG in which they also identify concerns with previous Road Safety Audit (RSA). On this basis, whilst not specifically identified as a RfR, I have also responded to these points in my PoE.

3.2. Structure of Proof of Evidence

- 3.2.1. This PoE is set out as follows:

- **Section 4** Provides a brief description of the Site and the Proposed Development;
- **Section 5** Sets out the scoping discussions that have been undertaken with the LHA to refine the proposed transport strategy and offsite assessment and outlines outstanding points of disagreement relating to highway access and safety as summarised within the agreed HSoCG (**CD 15.3**) and EHDC SoC (**CD 6.3**).
- **Section 6** Considers the principal of access from the A road in response to LHA / EHDC concern and provides case studies where A road access has previous been approved in Hertfordshire;
- **Section 7** Sets out wider considerations of safety and sets out how the design has been reviewed through a robust safety audit process.
- **Section 8** Considers comment as raised by the LHA in relation to the A10 crossing and approach speed limit on the A10 and provides response in this regard.
- **Section 9** Summarises the key points outlined in the previous chapters.

- **Section 10** Provides further 'Vehicle Access and Safety' consideration following the recent update of the National Planning Policy Framework (NPPF)

4. DEVELOPMENT PROPOSALS

4.1. Introduction

- 4.1.1. This section of the PoE sets out the key details of the Proposed Development including scale, location and access. The transport strategy for the Proposed Development has been developed in consultation with HCC with further details of this consultation set out in **Section 5** of this PoE.

4.2. Site Location

- 4.2.1. The site is located to the west of Buntingford, East Hertfordshire. The site is bounded by the A10 to the east, the A507 Baldock Road to the south, Throcking Lane to the north, and by open land to the west. An extract from the 'Application Boundary Plan', prepared by David Lock Associates (DLA), is shown in **Figure 4.1**.
- 4.2.2. The A507 Baldock Road provides access to Buntingford from the west. The A507 runs on an east-west alignment providing access to Baldock, Shefford and up to the M1 at Ridgmont Interchange. To the east, the A507 finishes at the Baldock Road Roundabout junction with the A10. The B1038 Baldock Road continues the connection to the east of the A10 towards the town centre.
- 4.2.3. Throcking Lane is a local road that bounds the site to the north and connects Throcking (to the west) with the A10 (to the east).
- 4.2.4. A well used public right of way crosses the A10 by means of a footbridge, which then provides direct access from the site to Skipps Mow and Bowling Green Lane – each of which are within very easy walk of the town centre, schools and employment. The site is located immediately adjacent to a successful employment estate to the east, beyond which is a proposal to expand employment development still further.
- 4.2.5. Further detail in relation to the accessibility of the Site is covered in Peter Blair's PoE which sets out that the site is both closely related to the existing town and has potential through the proposed transport strategy for a high proportion of proposed trips to be made by sustainable modes of transport.

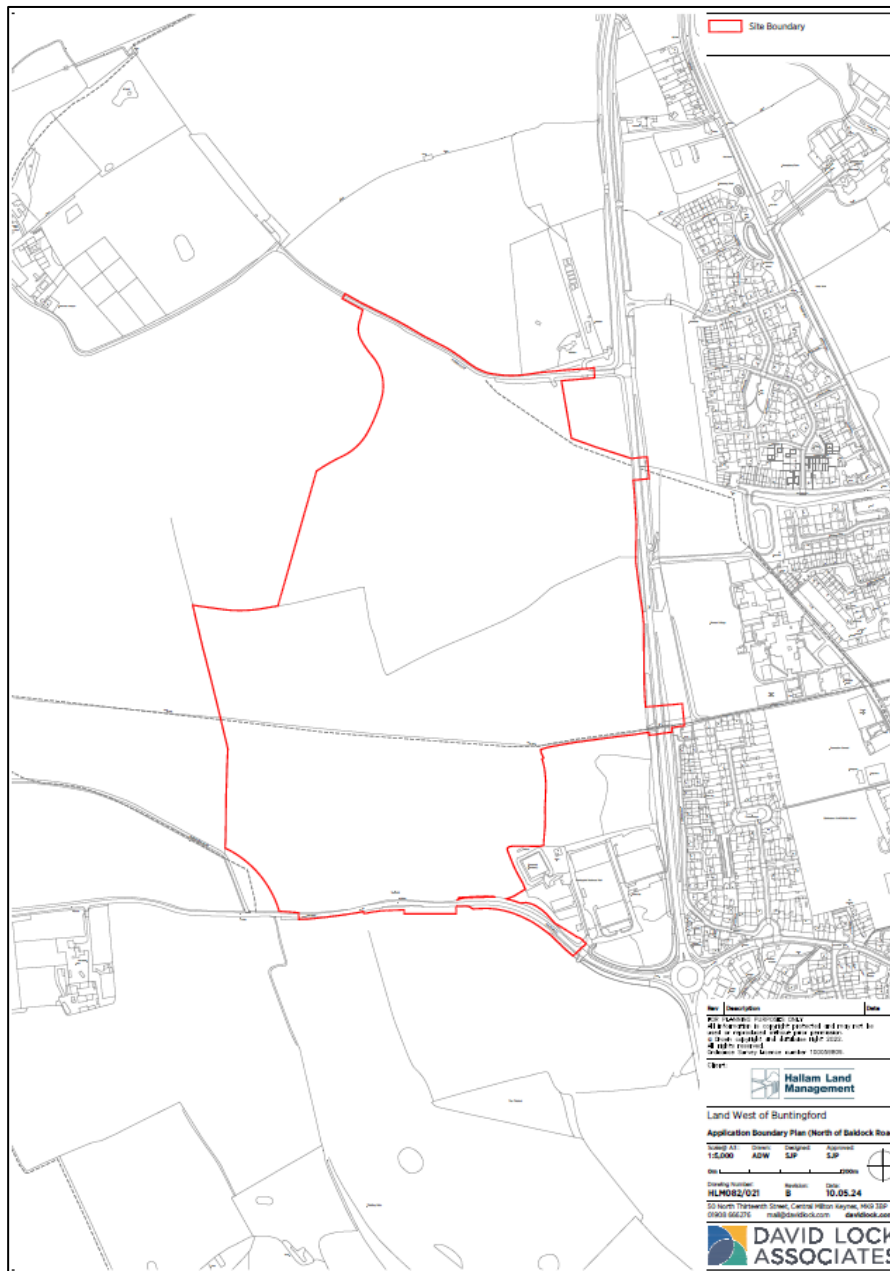


Figure 4.1 – Application Boundary Plan (CD 1.3)

4.3. Development Proposals

- 4.3.1. The planning application was registered and validated by EHDC on the 28th May 2024 under reference 3/24/0966/OUT. The description of the 'Proposed Development', is as follows:

"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 save for access"

- 4.3.4. As discussed in Peter Blair's PoE the introduction of a local centre and primary school within the proposals, at the heart of the community, clearly presents opportunity for trips to be retained within the site, which, given the short distances involved would likely be undertaken via active modes.
- 4.3.5. In tandem with the work carried out in relation to this proposal I have also been involved in advising the same client as the appeal proposals in respect of their discussions, which have been held with the LHA, in relation to a further development to the south (planning application reference 3/24/1255/OUT), for a separate employment scheme which is described as follows:

'Outline planning application for development of employment land (flexible use B2, B8, E(c) and E(g)), informal open space, associated works and infrastructure including a new access from A507, with all matters reserved except for access'.

- 4.3.6. The latest associated Land Use Components Plan, as produced by DLA, for this employment development is set out in **Appendix B** of this PoE and is outlined below in **Figure 4.3**.



Figure 4.3 – Extract of Land Use Component Plan for employment proposals located south of the Proposed Development (CD 10.19)

- 4.3.7. This application is linked to the Proposed Development since it would share the same proposed access albeit the proposed employment development would be accessed from a connecting arm to the south of the proposed access roundabout (discussed further below) whereas access for the Proposed Development would be taken from an arm connecting with the north of the proposed roundabout. In addition, the proposed active travel connection strategy connecting along Baldock Road and into Buntingford has been designed to cater for both the employment proposals and residential proposals. Accordingly, these applications can be delivered in tandem or independently as individual developments.

- 4.3.8. Evidently should the employment proposal also be granted consent there would be obvious synergy between the proposals and further opportunity for active work based trips. On this basis access proposals have been designed with space to enable high quality active travel connections between the employment proposals and appeal site, which are set out in a cumulative access design. This is discussed in further detail in Peter Blair's PoE

4.4. Transport Strategy

- 4.4.1. **Figure 4.4** below provides a high-level summary of the key components of the proposed access strategy for the site. In addition, further detail relating to each element of the access strategy are also provided below. It is noted that this access strategy has been developed in close consultation with the LHA both in relation to the Proposed Development, and, in the case of shared connections on Baldock Road, in relation to the employment proposals. As discussed in **Section 5**, broad agreement was obtained from the LHA in relation to the access strategy of the Proposed Development, with the main objection in relation to transport therefore specifically focussed on the development's location (i.e. to the western side of the A10). Moreover, the access strategy was subject to safety audit during its design evolution, and whilst minor design suggestions were identified by the auditor which have been considered in subsequent designs, no specific safety issues were raised. It is also noted that further safety audits were commissioned as part of this appeal process to consider proposed changes to the network since the first audit, and to review a further option for design of the at grade crossing of the A10. To note these audits have also raised no safety issues. The details of these Road Safety Audits (i.e. the original audit and updated audits undertaken as further information for this appeal) are discussed in **Section 7** of my PoE.



Figure 4.4 – Components Plan with Active Travel Connection

- 4.4.2. To provide a complete picture of the transport strategy I have set out in full detail the proposed transport strategy (inclusive of sustainable transport connections) as developed by Jubb / Ridge on behalf of the appellant. Full response relating to the accessibility of the proposals, in terms of access by sustainable modes, has however been provided by Peter Blair in his PoE. As discussed in **Section 3** I will cover matters of 'Access and Highway Safety' in my PoE.

Active travel connections

- 4.4.3. Three points of connection between the site into Buntingford are proposed across the A10. These are described as follows:
- Provision of an additional footbridge crossing across the A10 (located approximately 150m south of the Throcking Lane junction) linking Public Right of Way (PRoW) 41 and 35 with connections provided to the Proposed Development on the western side of the A10 and improvements made to the PRoWs into Buntingford to the eastern side of the A10.
 - An additional active travel bridge is also proposed across the A10 located just north of the existing pedestrian bridge connecting PRoW 40 and 36, which is situated approximately 400m north of the Baldock Road junction.

- Proposals for an active travel corridor linking the proposed roundabout access on Baldock Road with the A10, with appropriate formal signalised crossing provided on the A10 (i.e. via a Toucan crossing), and enhancements to active travel made on the eastern side of the A10 on Baldock Road going into Buntingford.

4.4.4. A drawing showing the proposed bridge connections and PRow improvement (i.e. to facilitate access across the A10 and into Buntingford) is provided in **Appendix C** which is extracted as **Figure 4.5**.

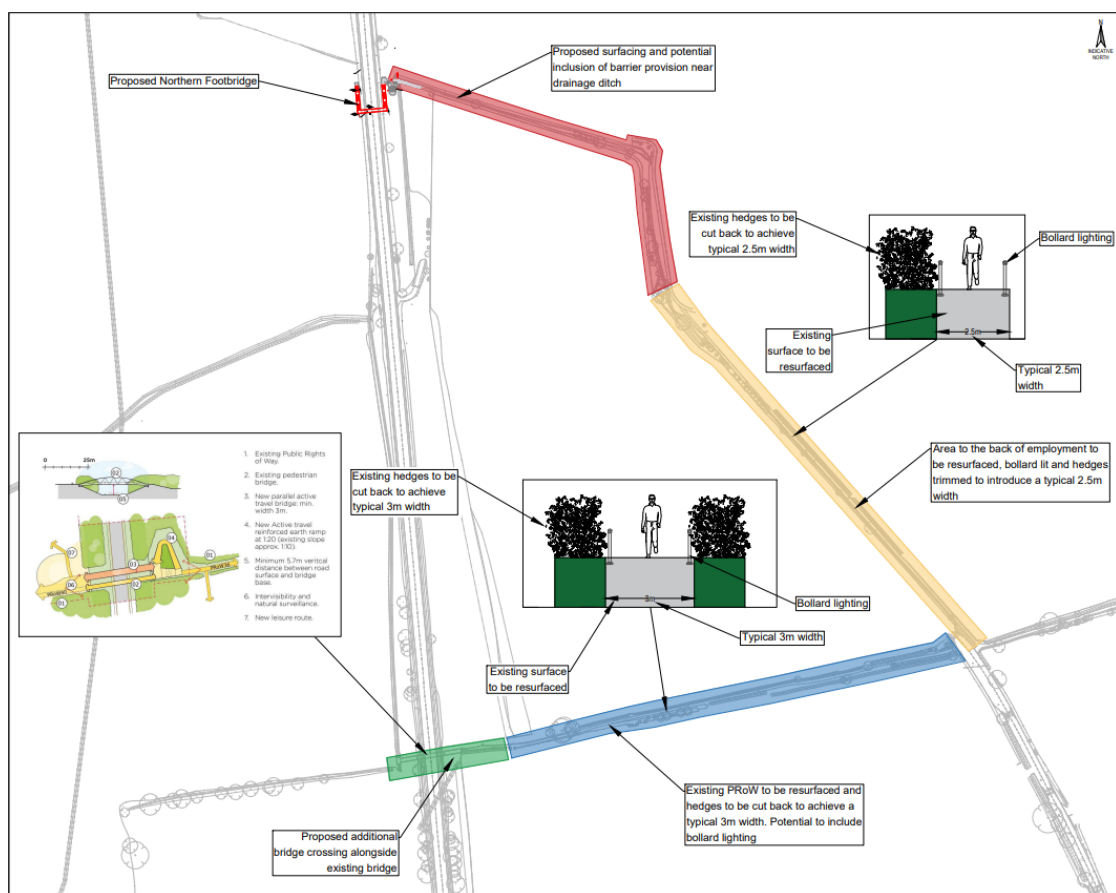


Figure 4.5 – Extract of drawing showing proposed Bridge connections and PRow enhancements linking into Buntingford

- 4.4.5. A design of the northern bridge has been proposed which includes a 2m pedestrian bridge over the A10 with appropriate steps provided either side. The location of this is shown in **Figure 4.5** ('Proposed Northern Bridge') above with details of the final design also included as **Appendix D** of this PoE.
- 4.4.6. The proposed new active travel bridge, located parallel to the existing footbridge connecting PRow 40 and 36, will provide an additional connection over the A10 of 3.5m in width. This bridge will include an appropriate ramp to allow a gradual gradient on the eastern side of the A10 to connect with RoW 36. The location of this is shown in **Figure 4.5** ('Proposed additional bridge crossing alongside existing bridge') above with details of the final design also included as **Appendix E** of this PoE.

- 4.4.7. As set out in **Figure 4.5** improvements will also be provided to the RoW network connecting to the east into Buntingford. This would include the provision of surfacing and the cut back of vegetation to improve width and surveillance. Furthermore, on the route south of Freman College and west of Park Farm Industrial Estate, shown in **Figure 4.5** as a blue and yellow shaded area respectively, low level 'human scale' lighting will be provided to provide good night time visibility on these routes. In addition, lighting is also proposed on the new parallel active travel bridge and would also be introduced on the existing bridge alongside, which will also include upgraded raised parapets to improve pedestrian protection and provide potential for aesthetic improvements to the facade (also shown in **Appendix E**).
- 4.4.8. Visuals produced by DLA have been included with my PoE as **Appendix F**. These visuals show the person level view of the new parallel active bridge and enhanced RoW 36. This shows how the route will provide an attractive, high quality, lit, and open environment for use by active travel users.
- 4.4.9. The active travel strategy will also include a shared pedestrian / cycleway that will run from the proposed roundabout access on Baldock Road towards the A10. Furthermore, the proposed access road will include active travel connection in the form of a shared pedestrian cycle route on the western side (which will connect into the proposed School and Local centre) and a footway on the eastern side. In addition, crossing points will be provided at appropriate locations as follows:
- Provision of a parallel pedestrian / cycle crossing just north of the proposed access roundabout to link in with the proposed active travel corridor towards the A10.
 - A parallel crossing across the existing Buntingford business park access on Baldock Road.
 - Provision of a staggered Toucan crossing across the A10
- 4.4.10. Details of the proposed vehicle access on Baldock Road and connecting active travel route is provided in **Appendix G**, which shows the linkages assuming only the Proposed Development is in place (i.e. assumes no connection to the employment proposals).
- 4.4.11. A cumulative access plan has also been developed in discussion with the LHA which accounts for both the introduction of the Proposed Development and employment proposals in tandem (**Appendix H**). This includes additional active travel infrastructure to link with the employment application to the south (i.e. on the southern side of Baldock Road). In addition, further crossing points will be provided as follows:
- Provision of a Toucan crossing to the west of the access roundabout on Baldock Road that will provide connection between the Proposed Development and the employment proposals to the south.
 - Provision of a crossing just west of the Buntingford business park on Baldock Road to connect the employment proposals to the active travel corridor connecting with and across the A10. This crossing point also provides connection between the additional bus stops discussed below.

- 4.4.12. In addition, the cumulative access also includes the provision of eastbound and westbound bus stops / laybys which has been introduced primarily as bus connection for the employment proposals, although could be used by residents of the Proposed Development as well. To note further direct bus access would however be introduced for the Proposed Development which is discussed further below.
- 4.4.13. East of the A10 the following enhancements are proposed to enhance active travel access, which are shown in the drawing included as **Appendix I**:
- An enhanced active travel corridor (i.e. 3m combined footway / cycleway) provided between the A10 and just east of Greenways and then on the southern side of the road between Greenways and a point approximately 100m east of Bowling Green Lane.
 - Proposed raised crossings are also identified to the east of Greenways and just west of Bowling Green Lane with crossings also provided on side roads as appropriate.
 - Provision of a priority narrowing as a traffic calming feature with informal crossing facility just east of The Pyghtle.
 - Provision of connection for the 3m combined footway / cycle way into Bowling Green lane. To note financial contributions are also proposed to enhance the cycle parking provision in town centre car park, as accessed off Bowling Green Lane, for use by people accessing the town centre on bike.
 - Provision of a raised table located approximately 100m east of Bowling Green lane providing a suitable gateway feature on approach to the town centre.
- 4.4.14. Furthermore, in consideration of the existing link on Skips Meadow between RoW 40 / 36 and Baldock road it is also proposed that additional wayfinding signage for the routes to / from the western side of the A10 linking with the town centre be provided. The proposed wayfinding strategy is set out in **Appendix J** (see also extract in **Figure 4.6** below) which will provide indication to users of the alternative route at Skipps Meadows via the existing footways on this road and connecting footway link (also within the highway boundary) with RoW 36. This link therefore provides an alternative option for active users traveling into Buntingford across the existing footbridge / parallel active travel bridge to cut down through Skipps Meadow to Baldock Road or likewise in the case of users travelling out of Buntingford on Baldock Road these users have the option to use the bridge crossings which they can access via Skipps Meadow.

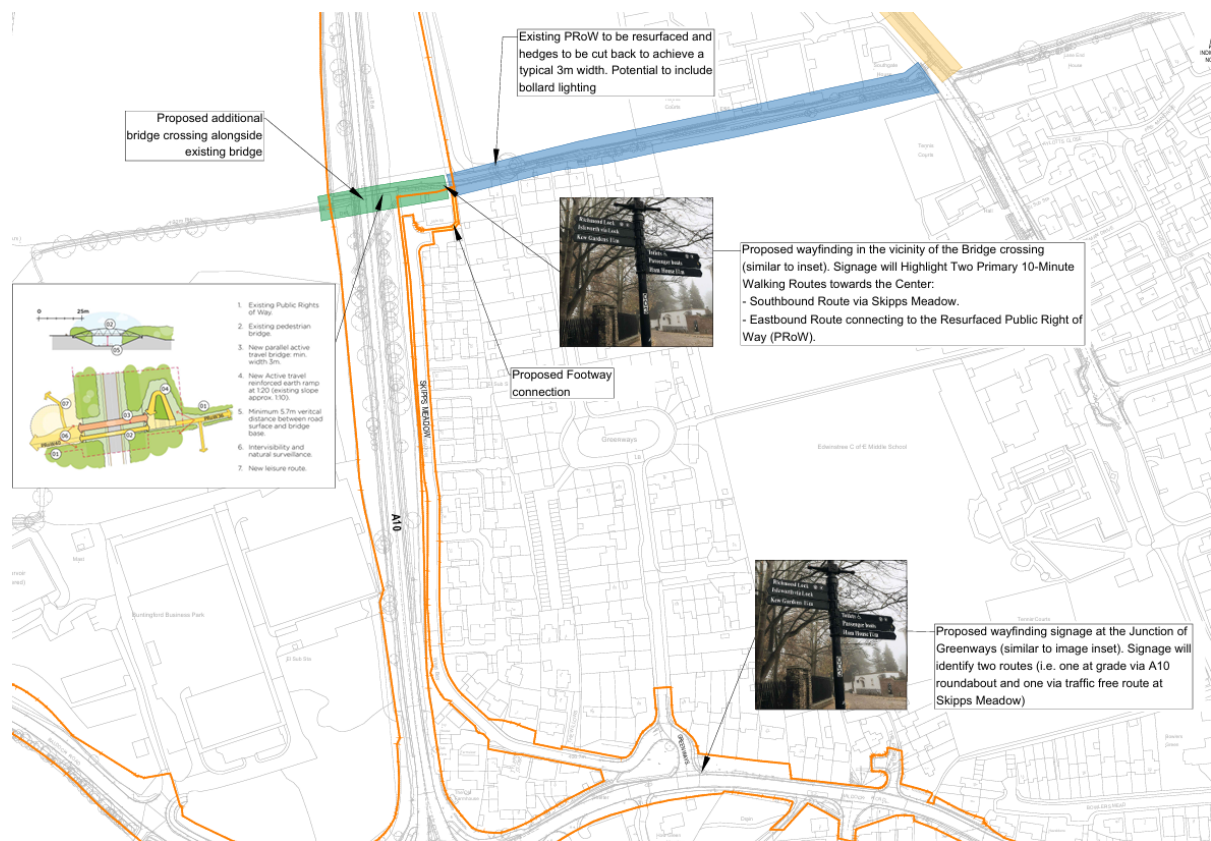


Figure 4.6 – Skipp's Meadow wayfinding strategy

- 4.4.15. Proposed mitigation within the highway boundary can be delivered by the developer through S278 agreement. It is proposed that enhancements to the RoW links would be undertaken through the LHAs statutory powers as highway authority with the applicant providing appropriate S106 contribution towards these works, although could also be delivered via S278 agreement if preferred.
- 4.4.16. Furthermore, should the LHA require, financial contributions can be provided towards the change of designation from PRoW to Bridleway (for example for RoW 36). As Peter Blair sets out in his PoE this is in accordance with HCC's general goal to upgrade routes across the county.

Public transport connection

- 4.4.17. The bus strategy has been agreed with the LHA and is based on a local diversion of the existing services of 18, 331, and 37 into the Site, thereby ensuring that all future residents will be within a short walk of a bus stop as summarised in **Figure 4.7** below.

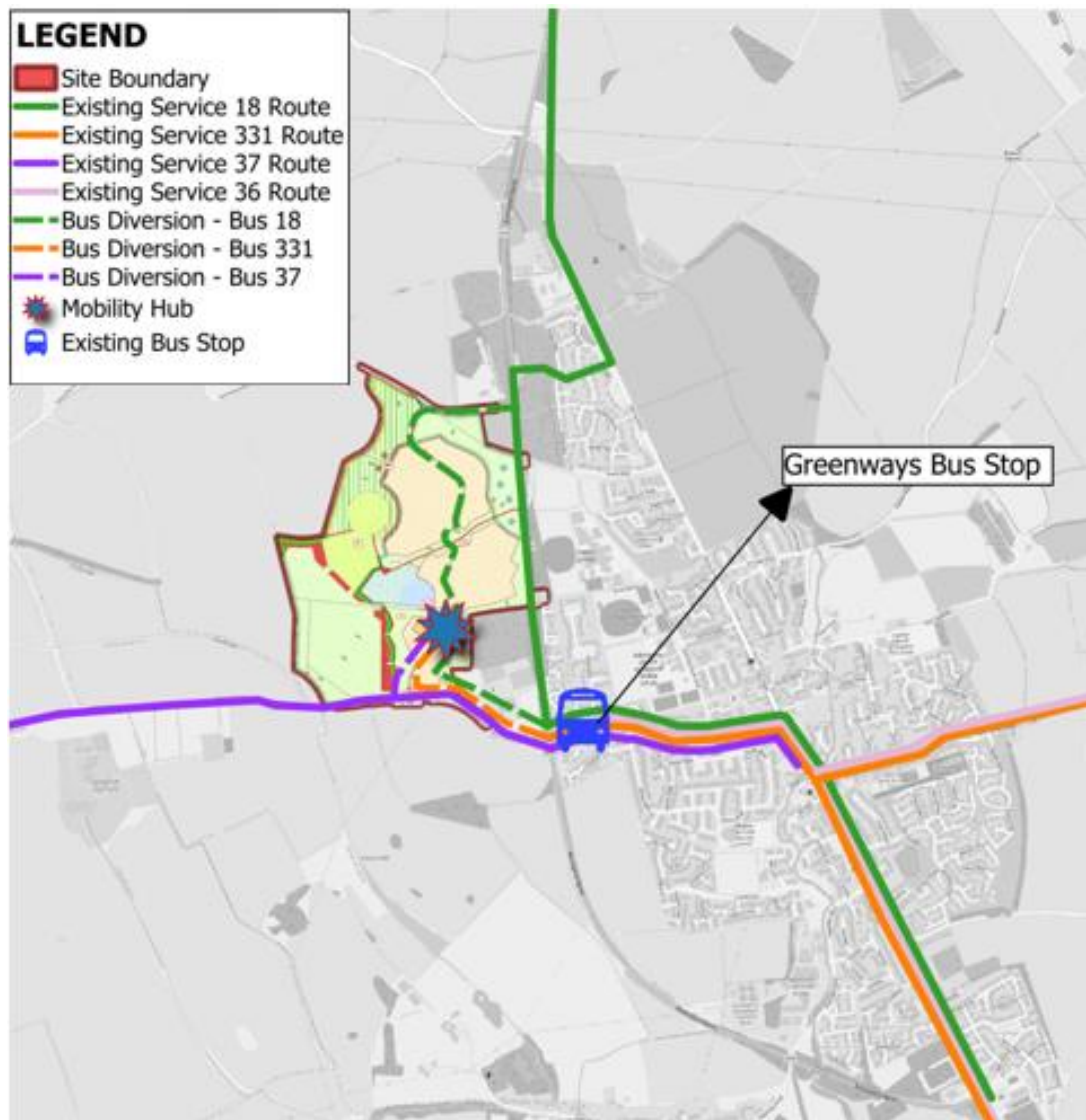


Figure 4.7 –Proposal for bus route diversion

- 4.4.18. A calculated index linked contribution of £300,000 (every year for 5 years) was requested by the LHA, which will allow service 331 to be delivered at a 30 minute frequency with further complimentary service provided by bus service 18 and 37). The applicant confirmed agreement to this request.
- 4.4.19. The key point of connection for these services would be at the mobility hub located in proximity to the local centre. This mobility hub would include a range of services that could encompass:
- Bus stops with appropriate shelters with Real Time Bus Information boards
 - Electronic Information boards specifying real time transport timetable information and associated community events
 - Cycle parking to allow residents to cycle to the hub and park their bikes
 - Provision of electric charging facilities for electric share bikes and for private users

- Electric scooter hubs
- Electric vehicle charging points
- Seating areas
- Car Club spaces

- 4.4.20. It was agreed with the LHA that a turning facility (so that buses can turn around in forward gear) be provided at the Mobility Hub to allow the 37 and 331 service to return to Baldock Road after stopping at the Mobility Hub. The introduction of this turning facility and Mobility hub would also serve to assist in development phasing (i.e. potentially beginning at the southern end of the development as indicated in the DAS Addendum) to allow early connection for bus 37 and 331.
- 4.4.21. In addition to the mobility hub a further bus stop connection has been agreed to be provided with the LHA to serve the northern area of the development, which, in agreement with the Passenger Transport Unit at HCC, can also include a turning facility to allow bus connection to the north by service 18 prior to the introduction of a full link road connection. This additional bus stop connection would further complement the Mobility hub and would bring convenient bus stop connection that would link through the centre of the community via the link road. Parking controls would be implemented on the link road to ensure that parked cars do not impact the efficiency of bus movements.
- 4.4.22. Further to the above, it was agreed that a contribution would also be provided in relation to lighting for the A10 / Throcking Lane junction to assist with bus movements at this junction under night time conditions.
- 4.4.23. In addition, the proposals will also include a £500 per dwelling contribution towards the Buntingford Community Transport Scheme. This will therefore further complement the measures as already agreed with HCC.
- 4.4.24. Moreover, the applicant has also agreed to set aside a reserve of £500 per dwelling for travel vouchers that could either be used for public transport tickets or could potentially be used for the purchase of bicycles or cycling equipment. This therefore acts as further incentive for occupants to take advantage of the excellent sustainable transport connections proposed from the very outset.

Vehicle access strategy

- 4.4.25. Vehicle access will be provided as follows:
- Roundabout access on Baldock Road (**Appendix G** and **Appendix H**) – Access will be provided via the northern arm of this roundabout for the Proposed Development. In addition, as shown in **Appendix H**, the access has been designed to allow connection from the south for the employment planning application separate to this appeal.
 - Throcking Lane access (**Appendix K**) – This is a three arm priority junction access with the main priority being Throcking Lane East / the Development access and the minor arm being Throcking Lane West.

- 4.4.26. In the vicinity of the site Baldock Road, Throcking Lane, and the A10 are currently signed as national speed limit. Notwithstanding this Jubb (now Ridge) has submitted evidence to the LHA to demonstrate that reduced speeds are appropriate on Baldock Road / Throcking Lane and the introduction of reduced speeds is in accordance with existing precedence. These discussions are set out in further detail in **Section 5** of this PoE which sets out the consultation with the LHA undertaken to date that has been summarised in a Technical Note referenced as an appendix in this Section.
- 4.4.27. To note, whilst the LHA has not agreed to a reduction to a 30mph speed limit as originally proposed by Jubb (now Ridge), a 40mph speed limit on Baldock Road and Throcking Lane has been agreed. Furthermore, the LHA has also recommended further speed reduction on the A10. Thus, the following speed limit changes are proposed:
- **Baldock Road to the west of A10** (shown on the horizontal alignment drawings included as **Appendix G** and **Appendix H**) - A 40mph speed limit from a point approximately 150m west of the proposed site access to include the whole stretch of road to the A10. This speed change will be marked on approach from the west of the access roundabout by an associated gateway feature (roundel and dragon teeth markings).
 - **Baldock Road to the east of the A10** (shown on the horizontal alignment drawings included as **Appendix I**) – A 40mph speed limit will be introduced (replacing the existing national speed limit) between the A10 and Greenways with an associated 30mph gateway feature (roundel and dragon teeth markings) on approach to the existing Buntingford 30mph zone continuing east from a point just west of greenways.
 - **A10 (Appendix L)** – Provision of a 40mph signage between the southern arm of the Baldock Road roundabout and a point just north of the Neal Drive junction. To note however, as I set out in **Section 8**, speeds are already reduced by the traffic calming feature of the existing roundabout and therefore this speed reduction can be excluded if preferred by the LHA.
 - **Throcking Lane (Appendix K)** - The development access itself would be subject to 30mph signed speed whereas to the east of this junction connecting with the A10 a 40mph speed limit is proposed.
- 4.4.28. The access and offsite highway works have been designed in consideration of this signed speed with appropriate visibility provided at crossing points in consideration of relevant design standards and existing highway character and conditions. The appropriate visibility sight lines are shown in the cumulative access design as included as **Appendix H**. This design includes details of earthworks proposed just west of the access roundabout which removes an existing road crest to ensure visibility in the vertical alignment. A separate drawing is included within **Appendix H** which shows visibility in the vertical alignment on approach to the access roundabout which was produced at the request of the LHA who confirmed approval.

Cycle and Car parking (including provision for electric vehicles)

- 4.4.29. Car and cycle parking will be provided in line with local policy, in particular the 'Updated Vehicle Parking Standards' SPD document from the EHDC Local Plan, adopted in July 2015 (**CD 10.20**). In addition, the provision for electric charging will also be provided in accordance with the Building

Regulations 2010 Approved Document S 'Infrastructure for the Charging of Electric Vehicles' (2021 Edition) (**CD 5.27**).

- 4.4.30. Further to the bike parking and electric charging provided for each proposed use the introduction of the mobility hub also provides opportunity to create a public charging facility for visitors and others passing by on the network. Thus, it is proposed that public cycle parking spaces be included to provide a set down area for users of the local centre travelling by bicycle and for cyclist users transferring to bus services. These bike parking spaces will be publicly accessible and in secure well-lit locations with appropriate natural surveillance.
- 4.4.31. Further electric charging will also be provided within the mobility hub in the form charging facilities for electric bikes and for cars. This will provide important infrastructure in accordance with the general trend towards increased use of electric vehicles as also supported by local and national transport policy. Moreover, this is of particular relevance, given options for car charging in Buntingford are limited to the petrol filling station on the eastern side of the A10 and there are limited options to introduce this infrastructure in other areas of Buntingford.
- 4.4.32. Car club access is also proposed within the mobility hub. Moreover, this could also be provided by way of electric vehicles.

4.5. Further potential offsite enhancements

- 4.5.1. It is understood that Hertfordshire are currently in disagreement as to the requirement for the on site primary school at this time and maintain that there are sufficient school places within Buntingford to accommodate the additional school children on site. To note the appellant disputes this and has provided evidence in this regard (prepared by Ben Hunter who is Associate Director at Educational Facilities Management Partnership Ltd) to demonstrate the school is needed. Notwithstanding this, it is proposed that land be set aside for the school which can be taken up as and when necessary.
- 4.5.2. In addition, further offsite active travel measures are proposed to improve connection to the nearest early primary provision (i.e. Millfield First School). These enhancements which are included as **Appendix M** of my PoE include the following that could be delivered by the developer through Section 278 agreement:
- Provision of dropped kerbs / tactile paving across Longmead at the junction of Longmead / Monks Walk Road
 - Introduction of tactile paving at two further junctions west of Millfield First School
 - Proposed speed cushions as traffic calming on Monks Walk Road just north of Longmead, and just west of Millfield First School (3 locations)
- 4.5.3. It is considered that these changes further enhance active travel connection from the key connecting routes.

- 4.5.4. To note I consider that further enhancements linking with Edwinstree Middle School (i.e. for later primary provision) are not required. As I have set out above there are already proposals for enhanced overbridge connections as part of the proposals linking the Site with PRoW 36. In addition, PRoW 36 will also be enhanced to provide a high quality route all the way to Bowling Green Lane.
- 4.5.5. Bowling Green Lane is already a minor residential route with only limited observed traffic flow. Furthermore, there is also a pedestrian route on the western side of Bowling Green Lane (provided in combination with footway directly adjacent to the road and sections through Norfolk playing fields) that provides a direct connection with the Edwinstree Middle School's entrance. Furthermore, existing traffic calming on Bowling Green Lane provides a slow traffic environment for cyclists.
- 4.5.6. Further to the above, a sensitivity phasing test traffic assessment has been undertaken which removes the traffic internalisation element of the school delivery. This assessment, which also removed the traffic changes associated with the previous proposed doctors surgery (that has now been removed from the proposals) continues to show that the impact on the offsite network is not significant. Details of this assessment is included as **Appendix N**.

4.6. Summary

- 4.6.1. As set out in this section the transport strategy of this Proposed Development has been designed to capitalise on the sustainable location (discussed further in Peter Blairs PoE) through the delivery of high-quality connections to enable trips to be undertaken via sustainable modes. In addition, as of more relevance to my evidence, high quality highway connection is provided that includes safe at grade crossing for active travel users where appropriate. Further detail relating to the consultation with the LHA at HCC in relation to this strategy is provided in **Section 5** of this PoE.

5. LHA CONSULTATION

5.1. Introduction

- 5.1.1. This section sets out the extensive consultation that has been undertaken with the LHA to date throughout this application. The section also makes reference to points of outstanding disagreement, which will be discussed in further detail in the subsequent sections of my PoE.

5.2. Transport Submission with application

- 5.2.1. A comprehensive Transport Assessment (Reference 23161-TA-01 v4 – **CD 1.12.i; and CD 1.12.ii**) and Travel Plan (Reference 23161-TP-01 v4 – **CD 1.13**) were provided as supporting transport information with the planning application pack. The content of these is described as follows:
- Transport Assessment (TA) - The TA provided detail as appropriate in relation to the proposed access strategy for all modes (i.e. active travel, public transport and vehicle) as appropriate and also included a detailed review of the accessibility of the site. In addition, details of forecast trip generation were also provided with robust highway models also discussed that set out that the impact of the Proposed Development on the nearby highway network would not be significant. Furthermore, the TA also included a review of local and national policy to set out how the Proposed Development accords with these key policies.
 - Travel Plan (TP) – This document, discussed further in Peter Blair's PoE, included details of proposed behavioural measures that would be introduced to encourage future residents to travel by sustainable modes. The strategies within the document would therefore serve to capitalise on the sustainable location of the development and high-quality sustainable transport links as provided by the transport strategy. The TP also sets out the management and implementation strategy and sets targets and strategies for monitoring of these targets as appropriate.

5.3. Further consultation following submission of the application

- 5.3.1. Details of the further discussion following submission of the planning application are set out in **Appendix O** of my PoE. This sets out the extensive consultation that has been undertaken with the LHA prior to determination which included numerous technical submissions.
- 5.3.2. In summary, it was evident from the final responses from the LHA following this consultation process, that the LHA has broad approval in relation to the package of measures identified. The only main concern, therefore, that the LHA has specifically identified, relates to the site's location, which the LHA considers as being inherently unsustainable and not providing special circumstance to warrant access to the A road.

- 5.3.3. The locational concerns related to the proposals are reiterated in the final highway response dated September 2025 (**CD 4.42**), which states, in bold text, the following:

The Highway Authority must note that our in-principle objection remains, namely that the site is fundamentally unsustainable and that no special circumstances exist to allow a new access from the 'A' road network.

- 5.3.4. To note, as discussed in **Section 3** of my PoE Peter Blair will provide evidence in relation to 'Sustainable Transport / Accessibility' that will respond on matters of sustainable access. In addition, as set out a response relating to A road access in **Section 6** of my PoE, I query the need to meet a threshold for special circumstances given that traffic impact is shown to be insignificant and precedence exists elsewhere in Hertfordshire for the introduction of A road access on higher order roads than the A507.

- 5.3.5. Whilst a brief statement was also provided on the final LHA response, dated September 2025 (**CD 4.42**), querying the delivery of the A10 crossing it was understood that this was mainly a concern raised by the officers considering the employment application and not a major concern in relation to the residential proposals. It is also noted that the response in the Delegated Officer Report (**CD 6.2**), dated October 2025, relating to the proposed development also made it clear that the LHA had no further access safety concerns:

"The proposed highway access onto Baldock Road has been revised following initial highway Authority comments with the proposed 'Dutch style' roundabout replaced with a conventional roundabout with Toucan crossing points. This revised layout has been subject to a Road Safety Audit. The Highways Authority have now accepted that the proposed access could be achieved without undue harm to highway safety. As such the proposals are broadly in accordance with policy TRA2 in terms of highways impacts, although the conflict with the Hertfordshire Transport Plan is noted."

5.4. Further work undertaken in response to the employment application

- 5.4.1. Further submission, post refusal of the residential development, has been made by Ridge in relation to the employment application in the form of two separate highway responses as discussed below:

- Technical Note 14 (**CD 10.22**) as issued in February 2026 in response to LHA comment as provided in August 2025 (included as Appendix B of Technical Note 14)
- Technical Note 15 (**CD 10.23**) as issued in March 2026 in response to LHA comment as provided in February 2026 (included as Appendix B of Technical Note 15)

- 5.4.2. The main points covered in these highway responses related to the delivery of the A10 at grade crossing and associated speed limit on the A10 on approach to this crossing. To note the LHA considering this application has retained concerns in relation to this which are set out in their final response dated 26th March 2026 (**CD 10.24**).

- 5.4.3. This development application was subsequently refused on the 6th May 2026 with RfR 1 of specific relevance to 'Highway Access and Safety' given that it makes specific mention in relation to the at grade crossing on the A10. This reason for refusal is set out as follows:

"Due to its siting and location, the proposals would be isolated and physically severed from the rest of Buntingford by the A10, with poor quality and unsafe active travel connections to the town. The provision of a signal-controlled crossing, at grade, located on the A10 in close proximity to the Baldock Road (A507/A10) roundabout due to its current road geometry, the characteristics of the traffic flows and unpredictable operation (of signalling) would create an unsafe environment for pedestrians, cyclists and other highways users. As such the proposals represent an unsustainable and unsafe form of development and would not be acceptable in highway safety terms. The proposals would not provide a genuine choice of alternative travel modes, would not ensure that safe and suitable access can be achieved for all users and would not amount to sustainable development (in accordance with the NPPF). The development would also result in a form of development outside of the settlement boundary, which in addition to the above harm identified, amounts to a significant conflict with the Development Strategy within the District Plan and objectives of the Buntingford Community Area Neighbourhood Plan. The proposal would be contrary to Policies DPS2, ED1, TRA1 and TRA2 of the East Herts District Plan (2018), policy BE2 of the Buntingford Community Area Neighbourhood Plan, policies 1 (The Transport Users Hierarchy) and 5 (Development Management) of the Hertfordshire County Council Local Transport Plan 4 (May 2018)), and paragraphs 110 and 115 National Planning Policy Framework)."

- 5.4.4. In addition, concern in relation to the at grade crossing is also subsequently mentioned in the EHDC SoC (paragraph 5.13), which is discussed further in **Section 8** of my PoE.

5.5. Outstanding points of disagreement following signed statement of common ground

- 5.5.1. Discussions have been held with HCC LHA and EHDC to identify points of agreement and narrow down matters not agreed. This process seeks to streamline the appeal process to the key points of disagreement.
- 5.5.2. A signed HSoCG has subsequently been issued to PINS as dated 16th June 2026 (**CD 15.3**) which is also included as **Appendix P** of my PoE for ease of reference.
- 5.5.3. Matters not agreed are set out in Section 9 of this HSoCG. These matters include considerations of sustainable access which will be covered by Peter Blair in his evidence. However, in summary the key matters of disagreement in relation to 'Highway Access and Safety' as responded to in my PoE are as follows:
- Paragraph 9.5 - *"Whether a safe pedestrian and cycle crossing can be secured at grade level over the A10 which enables the active travel corridor to be delivered between the development and the town centre."*
 - Paragraph 9.6 – *"Whether the Road Safety Audit is comprehensive and has been finalised to the satisfaction of the Highway Authority."*

- Paragraph 9.7 – *“Whether the proposed speed limit reductions on the A10 are agreed with the LHA, in accordance with the findings of the Road Safety Audit.”*
- Paragraph 9.12 – *“Whether there are (any) special circumstances to allow a new access from the A507 to the site.”*

5.5.4. To note I have set out in separate sections of my PoE a response each of these points as follows:

- Considerations relating to A road access (responding to Paragraph 9.12 of the HSoCG) is provided in **Section 6**
- Response in relation to the RSA (responding to Paragraph 9.6 of the HSoCG) is provided in **Section 7**
- Consideration of the A road crossing and the subsequent approach speed limit (responding to Paragraph 9.5 and 9.7 of the HSoCG) is provided as is provided in **Section 8**

5.5.5. In addition, whilst RfR 1 has specific reference to concerns related to traffic impact, as the consultation summary in **Appendix O** sets out, no such concerns were raised by the LHA during the course of the application prior to decision. Furthermore, the transport HSoCG also confirms, in paragraph 8.2, that the traffic assessment is accepted by the LHA and does not show significant impact on the network. Moreover, as discussed in **Section 4**, whilst this assessment has been subject to phasing sensitivity test presented in my evidence, this also shows no significant impact on the offsite network. On this basis I do not consider there are any reasons for further rebuttal related to traffic impact within with my PoE as this is a resolved matter.

5.6. Further work post signing of SoCG

5.6.1. In consideration of the Inspectors recommendation during the Case Management Meeting on 17th June 2026 for further continued cooperation between the parties I have made contact with the EHDC and the LHA to further discuss the at grade crossing proposals and speed limit change. A subsequent meeting was held on the 7th July 2026 in which the LHA confirmed that they would be receptive to considering potential alternative design options to address their key queries in relation to the A10 Toucan Crossing. These further discussions are set out in **Section 8** of my PoE in which I discuss a further crossing design option that was developed following this further LHA consultation.

5.7. Summary

5.7.1. As I have set out within this PoE, significant consultation has been undertaken throughout the timeline of the application for the Proposed Development with HCC LHA. In addition, numerous submissions have been made to the authority, as set out in **Appendix O**, providing details of the proposed transport strategy, which has been further refined during the course of the application. Furthermore, details of offsite assessment and mitigation have been provided as and where required. To note this has resulted in broad agreement in relation to the technical submission relating to the proposals with the main point of outstanding objection raised by the LHA, as I understood, being the location of the development in relation to the A10 (i.e. as a point of principal), that they argue would be unsustainable and car reliant, and whether there is therefore a ‘special

case' for A road access. This point that has also been reemphasised in the HSoCG (**CD 15.3**) in the Matters not Agreed section.

- 5.7.2. On this basis I have provided response in relation to consideration of A road access in my PoE (**Section 6**) that considers whether a 'special case' requirement for A road access is appropriate. Separate to this Peter Blair's PoE will respond to demonstrate how appropriate sustainable access is provided from the site to key destinations both within Buntingford and beyond and therefore that the proposals are not 'car reliant'.
- 5.7.3. Furthermore, following completion of a signed HSoCG (**CD 15.3**) the LHA has also raised concerns in relation to issued safety audits, and concern related to the safety of the at grade crossing on the A10 (a point also raised EHDC's SoC – **CD 6.3**) and its associated approach speed limit. Whilst these safety related concerns have not been raised in the RfR related to the proposed development specifically I have responded to these in **Section 7** (Road Safety Audits) and **Section 8** (A10 at grade crossing and proposed approach speed limit) of my PoE in any case. In addition, **Section 8** also sets out further discussions on the A10 at grade crossing / approach speed since signing the HSoCG.

6. A ROAD ACCESS

6.1. Introduction

- 6.1.1. This section provides a response to the point raised by the LHA in relation to the proposals for A road access in consideration of their statement in their final 19th September 2025 response (**CD 4.42**) that states that:

“..The Highway Authority must note that our in-principle objection remains, namely that the site is fundamentally unsustainable and that no special circumstances exist to allow a new access from the 'A' road network...”

- 6.1.2. This point is reiterated in the Matters not Agreed section within the HSoCG (**CD 15.3** and **Appendix P**) which states the following in paragraph 9.12:

“Whether there are (any) special circumstances to allow a new access from the A507 to the site.”

- 6.1.3. It is understood that this is in reference to specific policy within the latest HCC Local Transport Plan (**CD 10.3**), which states the following in Policy 5 (f):

“Policy 5 Development Management:

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

...

f) Only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of the proposals.

...”

- 6.1.4. On page 54 in relation to the ‘application’ of Policy 5, the LTP (**CD 10.3**) states:

“Primary and main distributor roads play a key role in the function of the road network and any new development proposing to have direct access onto these types of roads will only be considered in special circumstances. The Road Hierarchy for Hertfordshire and further detail on its implications are contained within the Network Management Strategy.”

- 6.1.5. This section of my evidence therefore considers the character of the A road when compared with other roads on the Hertfordshire A road network and reviews case studies where A road access has been approved in the county. In addition, the impact of the proposed development on the highway network is also considered.

- 6.1.6. To note considerations in relation to the sustainable access in response to LHA comment arguing the site is “fundamentally unsustainable” are provided in Peter Blairs’ PoE.

6.2. The A507

- 6.2.1. The below provides further details in relation to the A507 from which access is proposed. The section therefore sets out details of the road classification and also provides a comparison of traffic flow when compared with other nearby roads in the Buntingford area.

Classification of A507

- 6.2.2. The A507, whilst technically classified as an A road, provides a more minor linkage in the vicinity of Buntingford and provides a local linkage to the A10 to the east and the A1 (M) / Baldock to the west. It is evident that the A507 represents a lower order of A road by its colour classification on OS maps which is shown in red (i.e. indicating non Primary A road) and not the green colour usually reserved for Primary routes (see extract below in **Figure 6.1**).

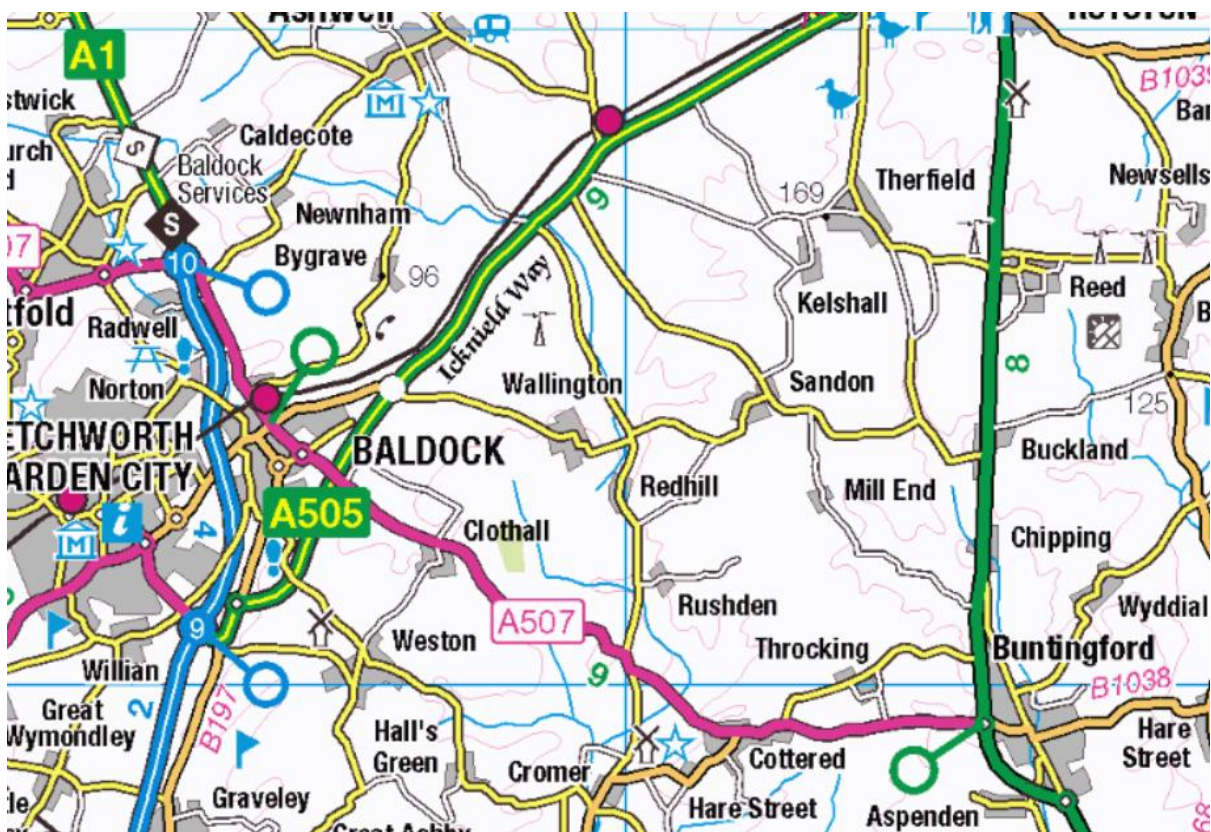


Figure 6.1 – Extract from map showing A507 marked as red (i.e. non Primary A road)

- 6.2.3. In addition, Annual Average Daily Traffic (AADT) data as extracted from the Department for Transport (DfT) web site also indicates that the A507 is much more lightly trafficked than other nearby A roads (albeit the A10 also has comparably low traffic in the area of Buntingford). In addition, it is also broadly comparable with the traffic flow on Baldock Road to the east of the A10 which already has residential access via the side streets either side of the road. This comparison is set out **Table 6.1** below with the associated location of each count point also included as **Figure 6.2** below.

6.2.4. As a further point I also note that the recent introduction of an ‘access only’ weight limit on the A507 between the A10 and Baldock (i.e. the South Road Roundabout) also provides further evidence that this is not now a main distributor for this area. Were it a main distributor it is unlikely that these types of vehicles providing important logistical service would be prevented from using this road as a connecting route.

Department for Transport count point	Recorded Traffic Flow AADT
Baldock Road east of A10 (count point 941476)	6294 (recorded in 2017)
A507 (Count point 7221)	7301 (recorded in 2019)
A10 (Count point 78297)	9527 (recorded in 2019)
A1 (Count point 56064)	46901 (recorded in 2022)
A505 (Count point 81052)	37918 (recorded in 2024)

Table 6.1 – Detail of recorded AADT traffic flows on roads near Buntingford (as extracted from DfT web site)

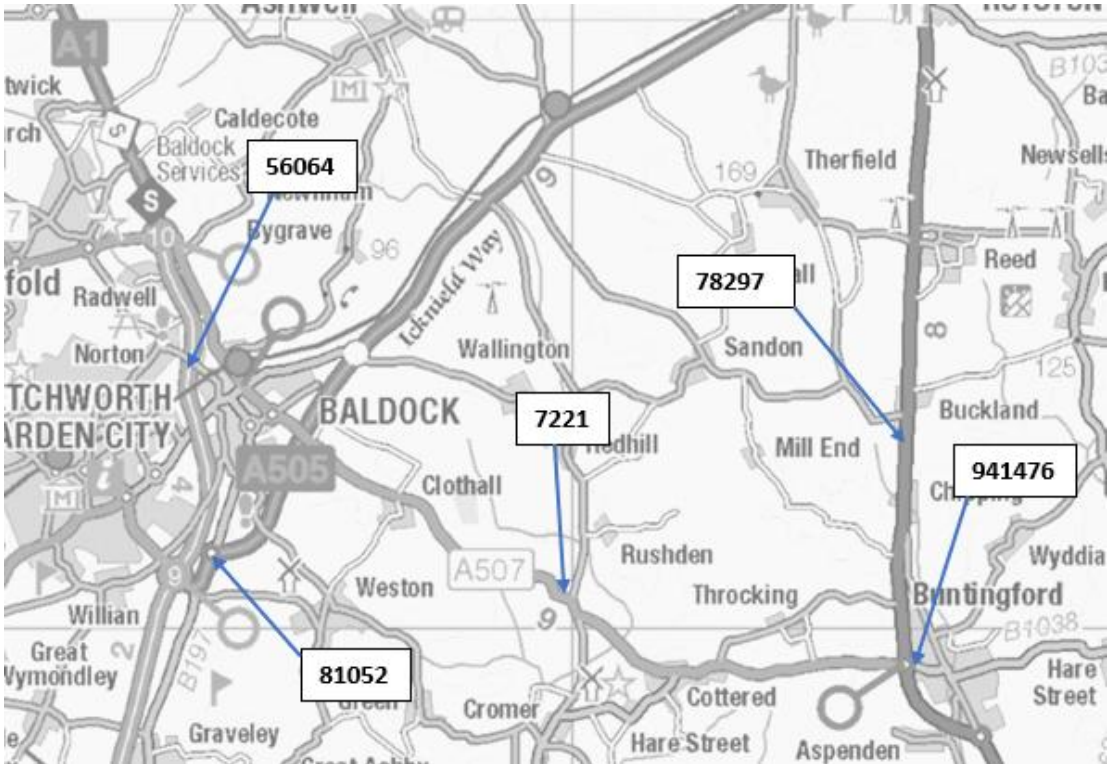


Figure 6.2 – Location of extracted DfT counts

Summary

- 6.2.5. It is evident that the A507, whilst technically classified as an A road, is not a primary route in the same way that the A1 and A505 would be. Moreover, the road also has far lower traffic flow that is more conducive of nearby residential streets (i.e. it is similar to Baldock Road east of the A10). In this regard, whilst any access would need to be designed in consideration of appropriate standards and to include appropriate capacity (as has been demonstrated), the road would provide a suitable point of location for access to a new community. This is particularly evident given, as set out in Peter Blair's PoE, the community will be closely related to the Buntingford and would therefore have significant opportunity for sustainable journeys which would serve to minimise traffic impact in any case.

6.3. Existing precedents for A road access

- 6.3.1. There are numerous examples of existing precedents for access to A roads being consented including for proposed new developments within this LHA. These include accesses, as set out below, to three edge of town locations in Hertfordshire very similar to the Proposed Development:
- A recently constructed access on the A10 (Neale Drive) associated with the 'Land North Of The Park Farm Industrial Estate and the Freman College Ermine Street Buntingford Hertfordshire' development (planning application reference 3/13/1375/OP)
 - A recently constructed access on the A505 at Royston serving the 'Land east of Garden Walk development' (planning application reference 14/02485/1)
 - A recently consented access on the 'A10 related to the Land East Of The A10, Buntingford, Hertfordshire' development (planning application reference 3/23/1447/OUT)
- 6.3.2. The details of each of these are discussed further below.

A10 Access (Land North Of The Park Farm Industrial Estate And The Freman College Ermine Street Buntingford Hertfordshire)

- 6.3.3. These development proposals, which are now constructed, are also located on the urban edge of Buntingford. The location of the proposals is set out in **Figure 6.3** below with a description of the development (application reference 3/13/1375/OP) set out as follows:

"Full permission for the erection of 180 homes, amenity land for community uses, the creation of one new access onto the A10 and closure of an existing access onto the A10 north of the site, creation of four new accesses onto Ermine Street and the upgrading of one access onto Ermine Street, and the provision of amenity space and associated infrastructure, and in outline with all matters reserved a 50-60 bed care home and sheltered accommodation."

- 6.3.4. These proposals were granted in 2015 and whilst this predated LTP4 (**CD 10.3**), LTP3 (**CD 10.25**), dated April 2011, as relevant document at the time did still discourage A road access as set out on page 25 of the document:

“New access to primary and main distributor routes will only be considered where special circumstances can be demonstrated in favour of the proposals. This will include consideration of why alternative proposals are not viable.”



Figure 6.3 – Site location plan extracted from Geoff Perry Associated Limited Drawing A712 16 A

- 6.3.5. To note whilst these proposals originally included for the closure of an existing access further north onto the A10 (condition 7) this closure has not been implemented following objection from Buntingford Town Council in 2021 (**Appendix Q**). Thus, access is still in place to the north of the proposals and the new 'Neal Drive' access therefore represents an additional point of access on the A10.
- 6.3.6. The Neale Drive access now serving this development (**Figure 6.4** below) is an all-movements priority junction on the A10 which includes a ghost island facility. The access not only provides an access to a new community to the north of Buntingford but also provides a link through to Ermine Street once open for use.



Figure 6.4 – Neale Drive Access (Source: Google maps: 2024)

- 6.3.7. This therefore demonstrates precedent for the introduction of appropriate points of access from A roads to serve communities that provide appropriate extensions to the town. As discussed above the A10 represents a higher category of A road and also carries more traffic than the A507 (although less than other higher order roads).
- 6.3.8. To note since this consent further consents have been granted for further housing just east of the A10 either side of the access which will further increase use of this road.

A505 Access (Land east of Garden Walk, Royston)

- 6.3.9. These proposals, which are in the process of construction, are also located on the edge of an urban area (i.e. Royston). The description of the development set out as follows:

“Residential development and community open space with new access onto the A505 (all matters landscaping, layout, access, scale, appearance reserved). (As amended by documents and plans received 27 February 2015)”

- 6.3.10. A plan showing the location of the site is provided below in **Figure 6.5**, with **Figure 6.6** showing the indicative site layout. These plans have been extracted from the relevant Planning, Design and Access Statement as produced by Bardford+co in February 2015.



Figure 6.5 – Site location plan as extracted from the Planning, Design and Access Statement as produced by Bardford+co in February 2015

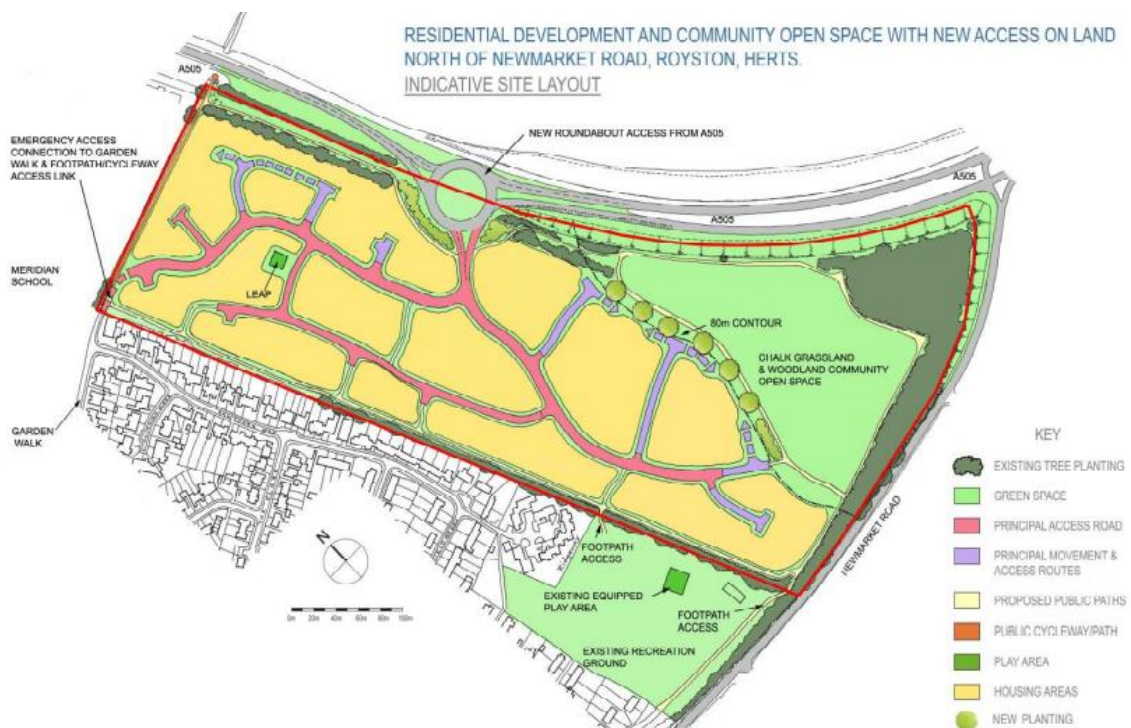


Figure 6.6 – Indicative site layout as extracted from the Planning, Design and Access Statement as produced by Bardford+co in February 2015

- 6.3.11. The proposed access from the A505 is provided by way of a roundabout junction (**Figure 6.7**). The A505 in this area is identified on OS maps as a higher order A road (green classification) compared with the aforementioned red identification of the A507. In addition, a Dft count point located just south of this access also shows flows in excess of the A507 (as identified in **Table 6.1**) with a total of 11786 movements recorded at the A505 count point just south of the new access junction (i.e. site 73631) in 2021.



Figure 6.7 – Royston A505 Access (Source: Google maps: 2024)

- 6.3.12. This therefore demonstrates how a roundabout access to a community (i.e. similar to the Proposed Development) has previously been consented on a higher order A road.

A10 Access - Land East Of The A10, Buntingford, Hertfordshire'

- 6.3.13. These proposals, which have received recent consent at appeal in 2024, are also located on the edge of Buntingford. The description of the development set out as follows:

"Outline planning application (with all matters reserved except for access) for up to 350 dwellings, up to 4,400 sqm of commercial and services floorspace (Use Class E and B8), and up to 500 sqm of retail floorspace (Use Classes E) and other associated works including drainage, access into the site from the A10 and Luynes Rise (but not access within the site), allotments, public open space and landscaping"

- 6.3.14. A plan showing the location of the site is provided below in **Figure 6.8**, with **Figure 6.9** showing the indicative site layout.

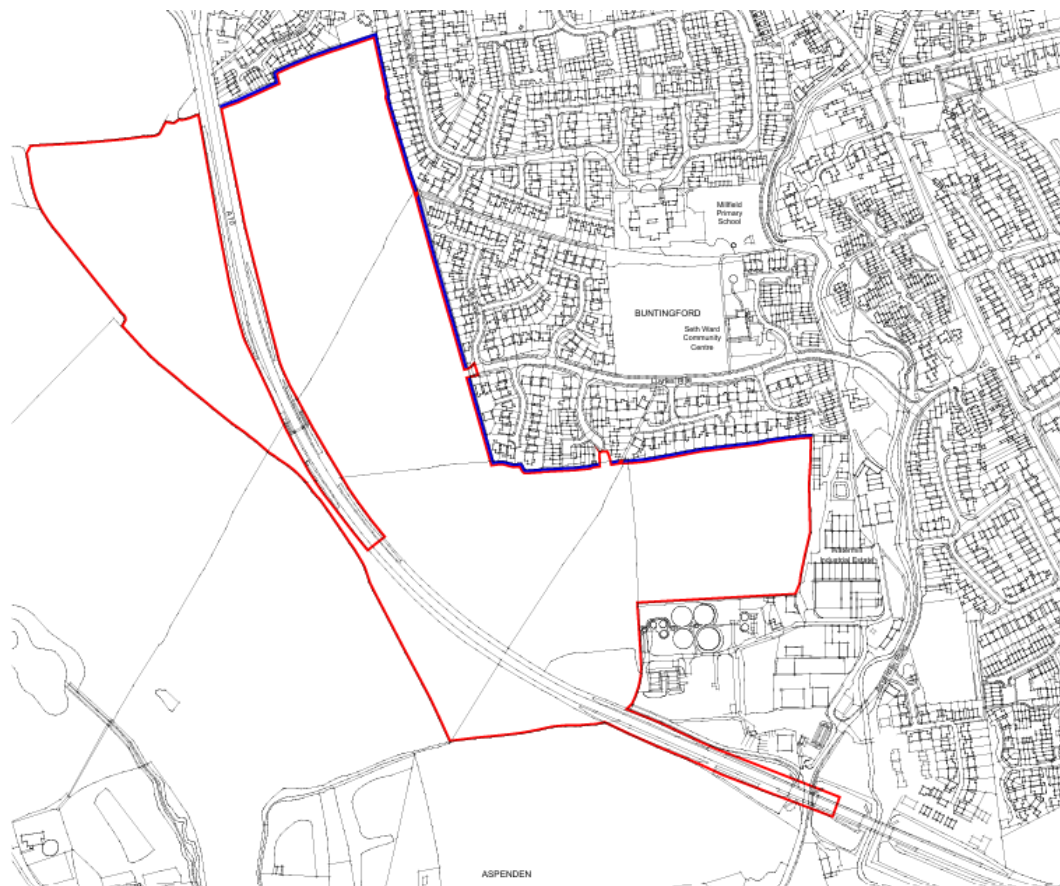


Figure 6.8 – Site location plan as extracted from fpcr drawing 10537-FPCR-XX-XX-DR-A-1001

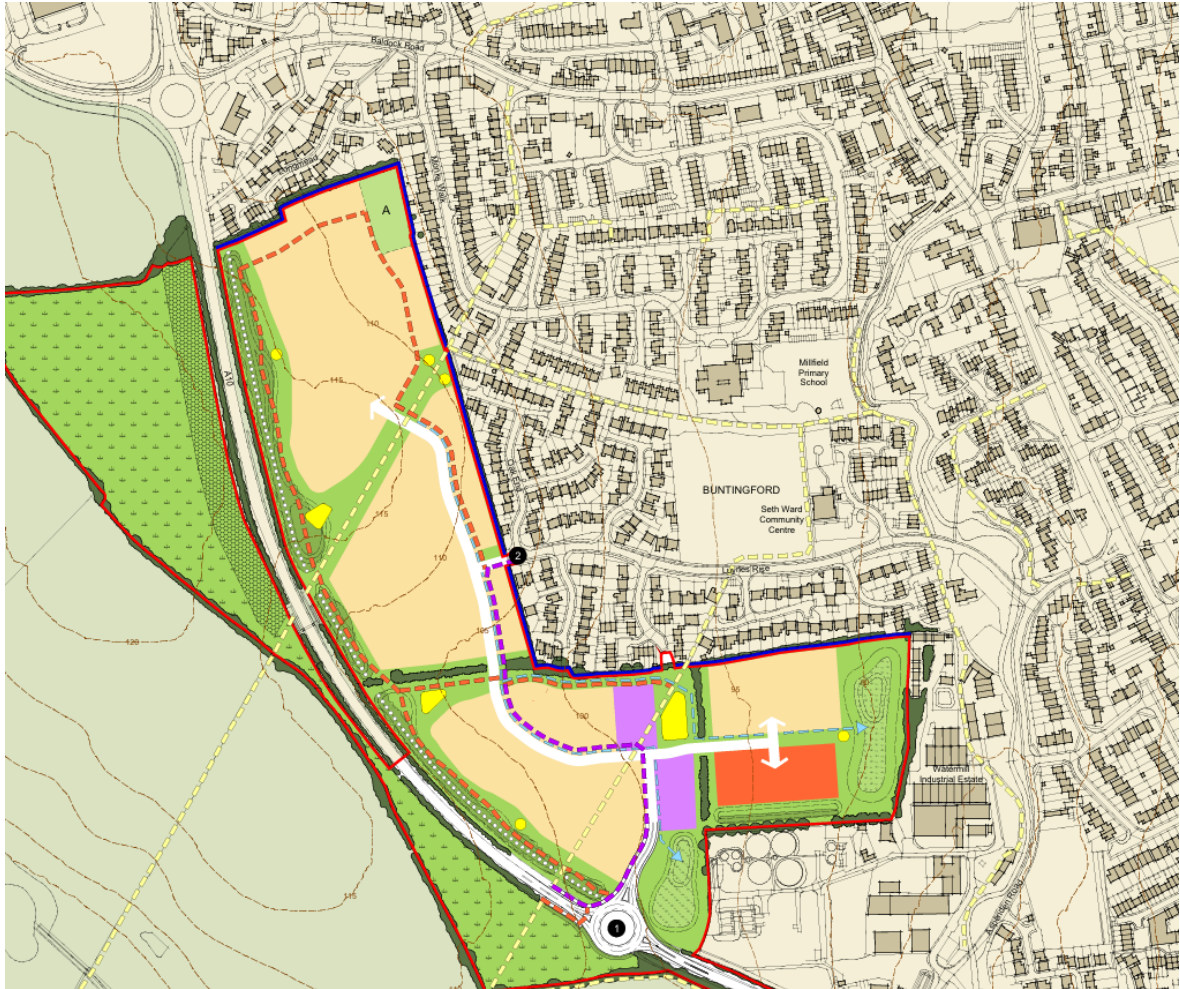


Figure 6.9 – Framework plan as extracted from fpcr drawing 10537-FPCR-XX-XX-DR-A-1002

- 6.3.15. The proposed access to the proposals, as set out in **Figure 6.10** below, provides access from the A10 via a new roundabout to the south of the existing A10 / Baldock Road roundabout.



- #### 6.4. Highway impact

- It is agreed that the traffic impact related tests in the NPPF are satisfied by the proposals."*

- 6.4.3. Furthermore, phasing sensitivity test as discussed in **Section 4** and summarised in **Appendix N** also shows no significant impact in this regard.
- 6.4.4. In this regard I would query why a threshold of special circumstance would even be relevant in this regard given that the impact would not be significant and therefore in my opinion far below the threshold of what would be considered to be severe.

6.5. Summary

- 6.5.1. It is evident from the above that the A507 represents a lower order A road and is appropriate for site access. Furthermore, as also set out above, existing precedence exists for access to be accepted by the LHA within Hertfordshire to the A road network for even higher order roads. Thus, there is no specific logical reason that access to the A road network for the Proposed Development should not be permissible in this instance.
- 6.5.2. The existence of a policy restricting A road access is likely targeted at ensuring efficient movement. However, as I set out above, the impacts of the proposed development are shown to be insignificant and therefore far below the threshold considered to be severe. In this regard I would question the need to justify special circumstance for access in any case given it has already been demonstrated that access would not significantly impact operation.

7. HIGHWAY SAFETY AUDIT

7.1. Introduction

- 7.1.1. This sets out details of RSA in response to the Matter not Agreed as set out in paragraph 9.6 of the HSoCG (**CD 15.3** and **Appendix P**) as set out below:

“Whether the Road Safety Audit is comprehensive and has been finalised to the satisfaction of the Highway Authority.”

- 7.1.2. In this section I therefore set out the consultation that has been undertaken prior the implementation of the RSA to agree the brief. Furthermore, this section also discusses the subsequent content of this audit following completion.

- 7.1.3. In addition, I also set out details of further audit that has been undertaken in May 2026, to review changes to the access strategy as undertaken since the original RSA, which provides further information to inform my PoE.

7.2. Road safety audit brief

- 7.2.1. As set out within consultation summary (**Appendix O**) discussion was held with the LHA to agree a RSA brief, with the final approved document included as Appendix I of Technical Note 11 (**CD 2.10.i; 2.10.ii; and 2.10.iii**) that was issued to the LHA in June 2025. This brief included the details of the auditor's curriculum vitae as approved by the LHA.

- 7.2.2. It is also important to note that this is confirmed in the HSoCG (**CD 15.3**) which states the following in paragraph 5.1 (bullet 1):

“The Audit has been carried out to an agreed brief, by an approved Practitioner, as pre-agreed with the LHA (details set out in Doc Ref: 23161 TN11).”

- 7.2.3. To note the appointment of an auditor independent of the main design team and LHA is important part of the process of transport scheme evolution and ensures appropriate impartiality in this regard. This is emphasised in the Design Manual for Bridges (DMRB) ‘Road Safety Audit’ guidance document GG19 (**CD 10.31**) which states in paragraph 3.3:

“The RSA team shall be independent from the highway scheme conception, design, construction and operation.”

- 7.2.4. It is also noted that the audit brief included as Appendix I of Technical Note 11 (**CD 2.10.i; 2.10.ii; and 2.10.iii**) also included specific mention of the requirement for consideration related to the proposed crossing of the A10. This is set out in ‘Scheme description / objective’ section of the audit brief which states the following:

- *“...Baldock Road improvements east of the A10 (Appendix K) which will be provided as part of residential and / or employment proposals – These improvements encompass:*

- *Introduction of a staggered Toucan crossing on northern arm of the A10 / Baldock Road roundabout, which will also include for an appropriate refuge area. Please note Hertfordshire County Council have made the following comment in this regard:*

“an RSA will need to consider in detail the safety of the currently proposed ‘at grade’ crossing of the A10 and this evidence will also need to be presented to our road safety team for their consideration. Furthermore, in the light of this mitigation measures may be needed to achieve safe sustainable access to the site.”

...

7.3. Road Safety Audit

- 7.3.1. It is also noted that, in accordance with the audit brief, this RSA reviewed all design drawings as produced at the time which included the point of access on Baldock road (including cumulative option connecting with the employment proposals) and links to the A10, the A10 at grade crossing, the Throcking Lane access, proposed active bridge crossings, and enhancements to the PRow network. This audit was set out within the RSA designer’s responses as included in Appendix J of Technical Note 11 (**CD 2.10.i; 2.10.ii; and 2.10.iii**).
- 7.3.2. Whilst the auditor had omitted consideration, in error, of the designed enhancements on Baldock Road east of the A10 an updated audit was undertaken to cover this following specific query in relation to this as raised by the officer considering the employment application as dated August 2025 (**CD 10.27**). This updated audit (Issue D2) was included in the Ridge Technical Note 14 responding to comment on the employment application (**CD 10.22**), as discussed in **Section 5**, and is also included as Appendix N of the HSoCG (**CD 15.3 and Appendix P**).
- 7.3.3. To note page 4 of this updated RSA (revision D2) includes mention of the LHAs requirement for further consideration in relation to the A10 crossing. Thus, it is evident that the auditor was aware of the need to consider this specifically.
- 7.3.4. Main comment in relation to safety has been set out in Section 2 of the revision D2 RSA. It is evident from this section that no safety issues have been raised by the auditor in this regard.
- 7.3.5. Section 3 of the audit is titled “Issues outside the scope of this audit and other observations”. This section includes further specific ‘observations’ in relation to the Toucan crossing in this section following, as the auditor identifies, highway authority request. which are included in Paragraph 3.2 and are as follows:
- *The proposals introduce a new 40mph speed limit immediately in advance of the proposed crossing on the approach to the existing roundabout;*
 - *The approach from the north is relatively long and straight with no features to indicate that the environment is changing over the current situation and as such vehicle speeds may remain similar to those currently observed;*
 - *There are many locations across the UK where either controlled pedestrian crossings or Toucan Crossing are provided in similar situations, and the audit team are unaware of any particular road safety concerns associated with these installations [sic]; some of which are on dual two-lane carriageways with higher speed limit approaches (my emphasis added);*

- The audit team accept that the design ethos of a staggered crossing rather than a straight single movement crossing is likely to be appropriate, but this would depend on how the crossing is phased and timed;
- There is no indication of the likely usage of the crossing and there are concerns that where crossings are not used the 'constant' green to drivers can be overlooked if it changes to red as local drivers become over familiar with the road layout. The audit team are also aware of situations where crossings of this type revert to red and / or change to red depending on approach speed and traffic volumes, some of which are time dependant, to manage vehicle speeds on the approach to the junction and prevent the "constant" green effect. These elements, however can only be considered as the detailed design progresses;
- There is the potential for drivers approaching from the north in particular those unfamiliar with the area, to assume that the roundabout is signal controlled and that they have right of way leading to the potential for failure to conform type collisions; however the audit team accept that the scheme is at preliminary design and the finer detail of the provision has not been addressed.

Based on these observations the audit team accept that the provision of a Toucan crossing at this location has an overall benefit in terms of active travel movements. **However, the concerns raised about drivers failing to recognise the nature of the control should be addressed as the scheme develops and appropriate signing should be provided on all approaches to warn drivers of the controlled crossing ahead. It may also be beneficial to include count down type markers for the change in speed limit and position it further to the north to allow segregation of the speed (my emphasis).**

Despite the concern raised above, in the opinion of the audit teams the segregation of cycle movements from the roundabout combined with positive control of cycle and pedestrian crossing movements on the A10 is likely to enhance safety for vulnerable user supporting both a safe system approach and the change in hierarchy of need identified in the latest version of the Highway Code. The audit team also note that despite the other proposed segregated crossings of the A10 the link along Baldock Road is likely to be a significantly used link to the wider Buntingford area for vulnerable users.

- 7.3.6. It is evident from this response that the auditor recognises that the introduction of a controlled crossing such as this is common, and, as is also worth noting, no issues were identified in the audit in section 2 in relation to this crossing or any other element of the proposed transport strategy. The auditor recognises the stage of the design process and notes that further refinement of the design can be undertaken as appropriate at later stages (i.e. detailed design). Thus, it was originally identified in the road safety audit designer's response as included as Appendix J of Technical Note 11 (CD 2.10.i; 2.10.ii; and 2.10.iii) that these changes can be picked up at detailed design stage as part of the S278 process.
- 7.3.7. Notwithstanding this, following a specific request from officer relating to the employment application to integrate recommendations into the highway drawings the following design changes were made:
- The speed 40mph speed limit signage has been positioned further north (i.e. north of Neal Drive) to allow the driver consideration of this speed change separate to consideration of the crossing;

- Separate signage was introduced further south on the A10 to further highlight the crossing to approaching drivers as recommended.

- 7.3.8. It is noted that speed countdown markers have not been applied given that Chapter 3 (paragraph 8.2.6) of the Department of Transport 'Traffic Signs Manual' (**CD 10.38**) specifically recommends against the introduction of this type of signage: *"Countdown" signs giving advance indication of a change in the speed limit are not prescribed and must not be used, unless they have been authorised by the national authority. In England, there is a clear policy not to authorise these signs.*"
- 7.3.9. In addition to comment on the A10 crossing there were also further recommendations as set out in Section 3 of the audit. Again these recommendations related mainly to detailed points such as the need to consider lighting design that would usually be considered at detailed design stage. However, in consideration of minor comment in relation to the narrowing on Baldock Road (east of the A10) and the subsequent need to provide give way on only one side this minor change was also introduced.
- 7.3.10. These revised changes were presented to the LHA in a subsequent Technical Note 14 (**CD 10.22**) as submitted on the February 2026 in relation to the employment application.

7.4. Further Road Safety Audit

- 7.4.1. To note a further Road Safety Audit has been commissioned by Ridge to capture design changes since the previous audit (i.e. D2) and further inform my PoE. This subsequent audit (i.e. D3) has been included as **Appendix R** and has been undertaken by the same approved auditor that reviewed the original design drawings.
- 7.4.2. Details of the design changes considered are covered in section 1 of this revised audit and include, for example, the introduction of shared pedestrian / cycle route west of the A10 (rather than segregated provision), as requested by the LHA during the design process. In addition, the proposal to introduce wayfinding signage on Skipps Meadow has also been included for in this audit.
- 7.4.3. In addition, a further drawing has also been put forward for audit, to review potential option for positioning of the A10 crossing further north from the exit arm of the Baldock Roundabout, following specific queries from the LHA in relation to the employment application that commented on positioning. The comments made by the auditor in relation to this in Section 3 of their audit (i.e. "Issues outside the scope of this audit and other observations") are discussed in further detail in **Section 8** of my PoE.
- 7.4.4. To note as with the original audit (i.e. version D2) this audit update (D3) did not identify any issues relating to safety as covered in Section 2 of the audit. Whilst minor comment was made in relation to the incorrect inclusion of a crossing east of the employment access drawing (i.e. given this would only be provided to link to the proposed development if both proposals were brought forward in tandem) this drawing does not relate to the residential proposals specifically and this crossing can be removed in subsequent drawings relating to the employment application.

- 7.4.5. A further addendum audit has also been provided to assess a potential further option for at grade crossing on the A10 following LHA discussion post signing of the HSoCG. This audit also did not identify any specific safety issues and is discussed in further detail in **Section 8** of my PoE.

7.5. Summary

- 7.5.1. It is evident from the above that the RSA has been carried out following an agreed brief using an approved and independent auditor. In this regard I consider that the audit has been delivered comprehensively in consideration of an agreed methodology and includes for specific further consideration as raised by the LHA. Thus, in response to the Matters not Agreed in paragraph 9.6 of the HSoCG (**CD 15.3**) I maintain that the audit process has been carried out comprehensively. Furthermore, the RSA's do not show persistent doubts in relation to the at grade crossing or any other part of the proposals.
- 7.5.2. Whilst the LHA appear to argue whether this '*has been finalised to the satisfaction of the Highway Authority*' I consider this point to be irrelevant. It is not for the LHA nor I to offer points of consideration, beyond initial briefing, towards the RSA process. To do so would invalidate the impartial nature of the process.

8. A10 AT GRADE CROSSING AND PROPOSED APPROACH SPEED LIMIT

8.1. Introduction

- 8.1.1. This section provides evidence in response to the specific comment as raised in paragraph 5.13 of EHDC's SoC (**CD 6.3**) as outlined below:

"There are significant unresolved concerns regarding the operation, design, and highway safety of the proposed A10 toucan crossing. The findings of the most recent Road Safety Audit highlight persistent doubts about whether a safe and secure crossing can be successfully delivered at this location. In particular the location of a signalised surface crossing close to the A10/ A507 roundabout on the trunk road network as well as the effectiveness of localised speed reduction are not considered acceptable in highway safety terms. As such, the proposal is considered to be contrary to the objectives of the Local Transport Plan and East Hertfordshire District Plan Policy TRA2, as well as paragraphs 115, 116, and 117 of the National Planning Policy Framework."

- 8.1.2. To note as discussed in **Section 5** of my PoE this point is also picked up in the HSoCG (**CD 15.3** and **Appendix P**), which identified the following as matters not agreed in Paragraph 9.5 and 9.7:

- Paragraph 9.5 - *"Whether a safe pedestrian and cycle crossing can be secured at grade level over the A10 which enables the active travel corridor to be delivered between the development and the town centre."*
- Paragraph 9.7 – *"Whether the proposed speed limit reductions on the A10 are agreed with the LHA, in accordance with the findings of the Road Safety Audit."*

- 8.1.3. This section therefore provides a response that considers the A10 crossing and approach speed limit below. In addition, case studies are also provided below that demonstrate, as also identified by the appointed road safety auditor, that at grade crossings such as that proposed are a common occurrence.

- 8.1.4. Furthermore, alternative design for at grade crossing are set out following further discussion with the LHA as part of this appeal.

8.2. A10 Crossing

- 8.2.1. When considering the A10 crossing it is important to note that the A507 west of the A10 and across the A10 junction has been identified as part of the EHDC Local Cycling and Walking Infrastructure Plan (LCWIP) (**CD 10.10 – 10.18**) as a secondary cycle route. Moreover, this secondary route connects with a primary route to the east of the A10. This network is shown in Appendix F of the LCWIP with appropriate extracts from this shown in **Figure 8.1** below.

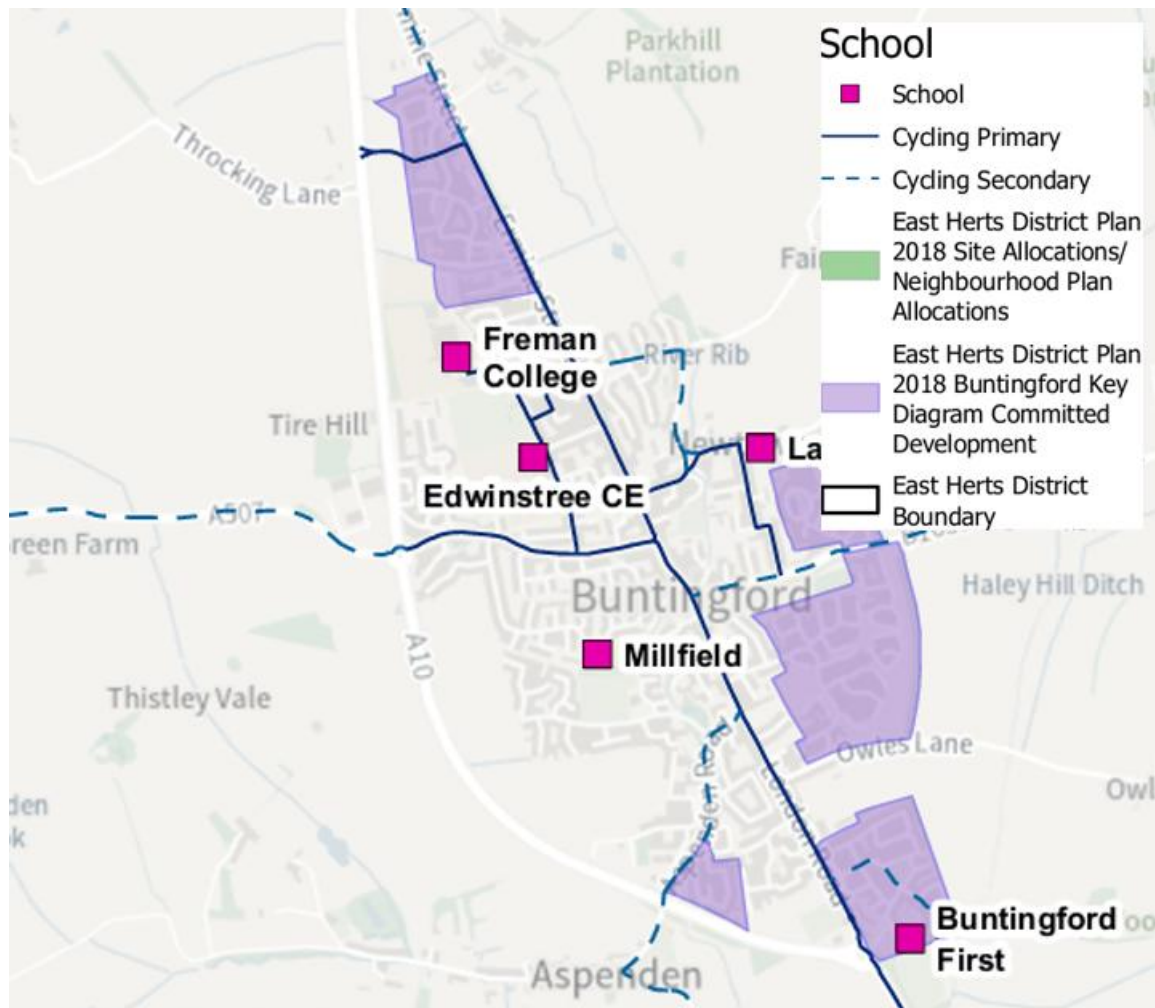


Figure 8.1 – Cycling overview extract from Appendix E of the East Hertfordshire LCWIP

- 8.2.2. It is therefore evident that the LHA recognise that the A507 is currently a route used by existing cyclists who would need to cross the A10 to travel into and out of Buntingford. Notwithstanding this, no enhancements have been identified in the LCWIP to cater for these movements which currently remain on carriageway.
- 8.2.3. In addition, Buntingford Business Park is located adjacent to the application site (i.e. to the south east) and therefore already demonstrates the approval and construction of development in the area of the proposals. To note the business park has also been identified as a location for suitable expansion (Policy BUNT3) in the East Hertfordshire District Plan (**CD 5.1**) with the location of this allocation extracted as **Figure 8.2** below. In this regard it is evident that the district council is at least accepting of the potential additional movements related to this potential use that could realistically include additional walking and cycling trips at grade across the A10 given the current access for the business park is obtained from the A507.



Figure 8.2 – Employment allocation BUNT 3 as extracted from the East Hertfordshire District Plan

- 8.2.4. In addition, a planning application (Planning Reference 3/25/1986/FUL) has been submitted for a proposal which will provide further employment building to the southeast corner of the existing Buntingford Business Park. Whilst this application has yet to be consented the LHA provided the following comment on the proposals on the 9th February 2026 (**CD 10.28**):

“The proposal would result in a notable increase in vehicle movements compared to the current level of activity. However, the site already accommodates an established industrial use with an existing access that is well connected to the A10. This junction has operated safely, with no recorded collisions in the past five years.

The site also benefits from a footway connection into Buntingford, providing links to the local bus network and access to nearby amenities such as lunch facilities. To minimise disruption during construction, the Highway Authority has recommended the inclusion of a Construction Management Plan condition.

Therefore, Hertfordshire County Council, as the Highway Authority, does not want to object to the granting of planning permission, provided that the Construction Management Plan condition is secured.”

- 8.2.5. Thus, it is evident from this comment that the LHA considers that further development is appropriate in this area (i.e. on the west side of the A10) and that suitable connections already exist across the A10 and into Buntingford for this.
- 8.2.6. I consider however that the establishment of a more formal crossing across the A10 for both pedestrians and cyclists would not only enhance safe connection in this regard but will also serve to potentially further encourage walking and cycling journeys for existing and planned developments.
- 8.2.7. Whilst the EHDC SoC (**CD 6.3**) does not make it clear as to what particular issues relating to the crossing point they consider to raise particular concern it is understood, based on reason for refusal raised for the employment application, and the final set of highway comments related to this in that regard that the following concerns remain outstanding:
- Crossing location – It is understood the LHA have concerns that the crossing is located, as they argue, too close to the Baldock Road roundabout. The particular concern relates to the crossing on the exit arm in particular and the potential effects of traffic queuing back to the roundabout.
 - Crossing control – That the system of control would create driver confusion
- 8.2.8. These are summarised in the final response relating to the employment application prior to decision as dated March 2026 (**CD 10.24**) which makes the following statement:

“As stated previously in the 27 February 2026 response by HCC Highways a signal controlled crossing positioned very close to the A10 roundabout entries and exits remains a fundamental safety concern. On the exit side in particular, a red phase would risk queues forming back onto the circulatory carriageway, with the associated blockage and collision risks. On the entry side, the proximity also interacts with the “constant green” behaviour that has been raised before. Drivers

travelling eastbound on the A507 naturally are focused on vehicles to their right as they enter the roundabout and not a proposed crossing on their left."

- 8.2.9. As I have identified in **Section 4** the design of the access strategy has been developed in consideration of relevant design standards and in consideration of the highway character and conditions. Furthermore, the original (i.e. version D2) and more recent (i.e. version D3) RSAs have considered the crossing location and have raised no safety issues in this regard. Notwithstanding this, I have responded to each design point below.

Crossing location

- 8.2.10. It is understood from responses provided in relation to the employment application that the key concern relates to the positioning of the crossing on the exit arm with the first concern being that the distance between the crossing would not be enough to prevent queuing back onto the roundabout. To note design guidance relating to the location of crossings is covered within DMRB CD116 (**CD 10.29** - paragraph 8.2.4) which references the requirements for pedestrian crossing junction distance separation as 'should' guidance:

*"Non-staggered signal-controlled crossings **should [my emphasis]** be sited either at 20 metres or more than 60 metres from the roundabout entry give way line.*

NOTE 1 On the approach to the roundabout, a distance of 20 metres for a signal-controlled crossing can reduce the likelihood of drivers confusing the signal with one controlling flow into the roundabout and it leaves sufficient storage space for vehicles waiting to enter the roundabout.

NOTE 2 On the exit, a distance of 20 metres reduces the likelihood that 'blocking back' can occur where traffic queues extend onto the circulatory carriageway and it helps to ensure that drivers are still travelling slowly as they approach the crossing.

NOTE 3 Where the crossing is staggered, the part of the crossing on the entry arm can be within the 20 metres to 60 metres zone.

..."

- 8.2.11. DMRB document GG101 (**CD 10.30**) provides the following clarification in relation to 'Should' guidance:

"The verb 'should' indicates advice expressed as a recommendation.

*Note: Recommendations with this verb form are good practice and **can be varied without recourse to the departures process [my emphasis]**, but require justification and **a safety risk assessment where the recommendation is not followed. [my emphasis]**"*

- 8.2.12. Thus, as made clear by my emphasis there is scope for flexibility in this standard, and, as we have set out in responses relating to the employment application it is considered that the positioning of the crossing provides a more direct route for active travel users. Moreover, the crossing has been subject to a safety audit as required with no safety issues raised.
- 8.2.13. Furthermore, whilst the LHA make the point that left turners from the A507 would not have time to react to this crossing I again consider this to be an unfounded argument given that traffic turning left will already be travelling at low speed commensurate to a required turning manoeuvre. Moreover, the existing informal crossing is already located just 5m from the roundabout exit (i.e. 5m less than proposed) and no existing safety concerns have been identified either here or

elsewhere in the network. This point is also made clear by the assigned safety auditor and is also confirmed in the HSoCG which includes the following agreement in paragraph 5.1 (bullet 3):

“There were no existing road safety concerns reported on the off-site network.”

- 8.2.14. Notwithstanding this, I consider this point to be largely irrelevant given the fact that there is extensive width of highway land, as indicative from the A10 / Skipps Meadows highway boundary extract as **Appendix S**, located either side of the A10 North approach that continues some distance from the roundabout. Thus, there is space to reposition the exit crossing (or indeed the entry) as well as reposition any signage and lighting infrastructure as typically considered at the detailed design stage. To note the following was agreed in paragraph 5.1 (final bullet) of the HSoCG:

“There is sufficient highway land to take on board further design recommendations as may be raised through a future Road Safety Audit process at the Section 278 stage.”

- 8.2.15. An example of a repositioned exit crossing was provided in Technical Note 15 (**CD 10.23**) as provided in response to the employment application which showed a potential alternative position at 15m setback from the roundabout (i.e. similar to the exit distance shown on the Cattlemarket Roundabout case study below and more than that shown at the Malabar Farm case study). Whilst the LHA continued to argue that this was not sufficient in this particular circumstance, even though the Cattlemarket roundabout represents a more major junction, the crossing can also be located 5m further back (i.e. 20m or indeed further) if that is indeed preferred.
- 8.2.16. I include a drawing showing potential options to setback the crossing both 15m and 20m as **Appendix T** to illustrate this point. Furthermore, this drawing has been included in the revised safety audit (i.e. issue D3) discussed in **Section 7**, which, as also discussed in **Section 7**, does not identify any highway issues in relation to these alternative crossing options or any further drawings submitted for consideration.
- 8.2.17. To note the updated RSA has however provided comment on the various options for crossing position in Section 3 of the audit (titled again ‘Issues outside the scope of this audit and other observations’) which states the following:

“In real terms there is little difference in road safety performance resulting from the crossing being setback 15m into the northbound link or 20m other than the HGV driver will have more time to recognise the signal and that the vehicle will be squarer to the approach. In terms of use pedestrians and cyclists prefer to cross on desire lines and will circumvent the identified route in order to achieve this. It would be advantageous to seek the highway authorities views on the crossing location and ensure as part of the detailed design process appropriate features are provided (such as guard railing) to ensure the identified path for vulnerable road users is follows.

The A10 southbound approach to the existing roundabout and proposed crossing is straight and while the proposals include advanced signing and a reduction in speed limit it would also be beneficial as part of the detailed design process to ensure that appropriate polished stone values (PSV) is provided to aid vehicle braking characteristics...”

- 8.2.18. It is clear therefore that the auditor considers that the relocation of the crossing at intervals further back from the roundabout is not required in safety terms and states that there is 'little difference' in road safety performance. Notwithstanding this, the option to set the crossing back further is available should the LHA prefer this.
- 8.2.19. To note the auditor has made further design recommendation for the introduction of guard railing and special surfacing on approach to the roundabout. Both are fairly standard requirements as typically considered at detailed design and can be included at that stage.

Crossing control

- 8.2.20. It is understood that concerns regarding crossing control follow on from comments made in section 3 of the original (i.e. version D2) RSA (included as Appendix N of the HSoCG **CD 15.3**) that relate to potential 'constant green' effect. To note, as discussed in **Section 7** of my PoE, these are 'observations' and not identified as a safety issue by the auditor. These comments are as follows:

"There is no indication of the likely usage of the crossing and there are concerns that where crossing are not used the 'constant' green to drivers can be overlooked if it changes to red as local drivers become over familiar with the road layout. The audit team are also aware of situations where crossings of this type revert to red and / or change to red depending on approach speed and traffic volumes, some of which are time dependant, to manage vehicle speeds on the approach to the junction and prevent the "constant" green effect. These elements, however can only be considered as the detailed design progresses;"

- 8.2.21. As the auditor points out additional red phases can be built into the crossing signal control independent of the push button call. Details of this can be agreed when setting out the control specification which is agreed at detailed design stage.

8.3. Speed limit on approach to A10 crossing

- 8.3.1. Whilst it is not clear from the EHDC SoC (**CD 6.3**) what the concerns related to approach speed are, previous comment was provided on this by the officer related to the employment application which stated the following in their final response dated March 2026 (**CD 10.24**):

"...The proposal to move the 40mph limit roughly 1.1km north of Neale Drive, together with a crossing warning sign, also raises issues. There is currently and no proposed active frontage or meaningful change in roadside environment along this section of the A10, so it isn't clear how the reduced limit would be interpreted consistently by all road users or how it would remain logically justified.

We have seen on other routes that long, isolated 40mph sections in areas with limited frontage can lead to overtaking issues, greater speed variability, and in some cases a general disregard for subsequent speed limits further along a journey. When the environment does not reinforce the posted limit, predictable behaviour becomes harder to achieve, which has implications for every road user. This is presented in HCC Highways adopted Speed Management Strategy (Nov 2020)..."

- 8.3.2. On responding to the above it should be noted that the inclusion of a 40mph speed reduction on the A10 has been introduced following the specific recommendations as set out by the Speed Management Group (SMG), which, as discussed in the consultation summary in **Appendix O**, was quoted in an email response dated 23rd October 2024 from the LHA in relation to the proposals as follows:
- “The SMG would be minded to support a 40mph speed limit on Baldock Road, **which will include the A10 roundabout (north and south approaches) [my emphasis]** and the short section east of the roundabout to the 30mph speed limit...”
- 8.3.3. To note this was not originally proposed by the applicant (it was only speed reduction on Throcking Lane and the A507 frontage that was proposed) and in fact there is a clear line of sight to the roundabout which would allow visibility on approach to the crossing signal heads commensurate with the higher existing speed designation if required and the roundabout already provides a traffic calming feature that would reduce required visibility standards to well below this in any case. Thus, I would argue that the speed change to 40mph is not a necessary requirement and a crossing could still be introduced across this arm as it has been introduced at the example below at the Cattlemarket roundabout which is also located on a national speed limit road.
- 8.3.4. Traffic travelling through the roundabout will be travelling at low speeds given drivers need to consider traffic on the roundabout on approach and the need to negotiate the roundabout prior to exit. Whilst this is a logical assumption, I have also commissioned speed survey to ascertain whether this is indeed the case. These speed recordings have been undertaken over the course of a two week period (i.e. March 6th to March 19th) using Automatic Traffic Counters positioned on approach from the north and south of the Baldock Roundabout on the A10. A summary of the results of this speed survey is provided as **Table 8.1** (full results in **Appendix U**) with a location diagram as provided as **Figure 8.3** below.

	A10 NORTH OF BALDOCK RBT				A10 SOUTH OF BALDOCK RBT			
	Northbound		Southbound		Northbound		Southbound	
	Average	85 th %ile	Average	85 th %ile	Average	85 th %ile	Average	85 th %ile
Week 1 (6 th March to 12 th March)	32.5	36.6	25.6	30.6	27.7	32.1	31.2	34.8
Week 2 (13 th March to 19 th March)	33	37	25.9	30.6	28	32.4	31.8	35.3

Table 8.1 – Recorded speeds from March 2026 Automatic Traffic Survey undertaken north and south of the Baldock Roundabout on the A10



Figure 8.3 – Position of Automatic Traffic Surveys undertaken in March 2026

- 8.3.5. It is evident from this summary that the speed of traffic on approach to the roundabout is already shown to be significantly lower (i.e. in the range of 30mph), even in consideration of 85% percentile figures, than the national speed limit would permit (i.e. 60mph). This reduction in speed is logical given the traffic calming feature of the Baldock Road roundabout and it would be expected that traffic speeds would further reduce as vehicles slow on approach to the roundabout. To note these speed recordings do not take account of the proposed 40mph speed signage and it would be expected that drivers would approach at further reduced speed should this be introduced.
- 8.3.6. Moreover, I consider the proposed extents as set out in **Appendix L** is logical (assuming a speed limit change is confirmed as required) in consideration of the recent introduction of access at the Neal Drive junction further north. Moreover, as set out in the drawing as produced by DLA architects (included in full as **Appendix V** and set out as extract below as **Figure 8.4**), setting out future consented and planned development form in the area, it is clear that the extension is commensurate with the future built form either side of the A10.

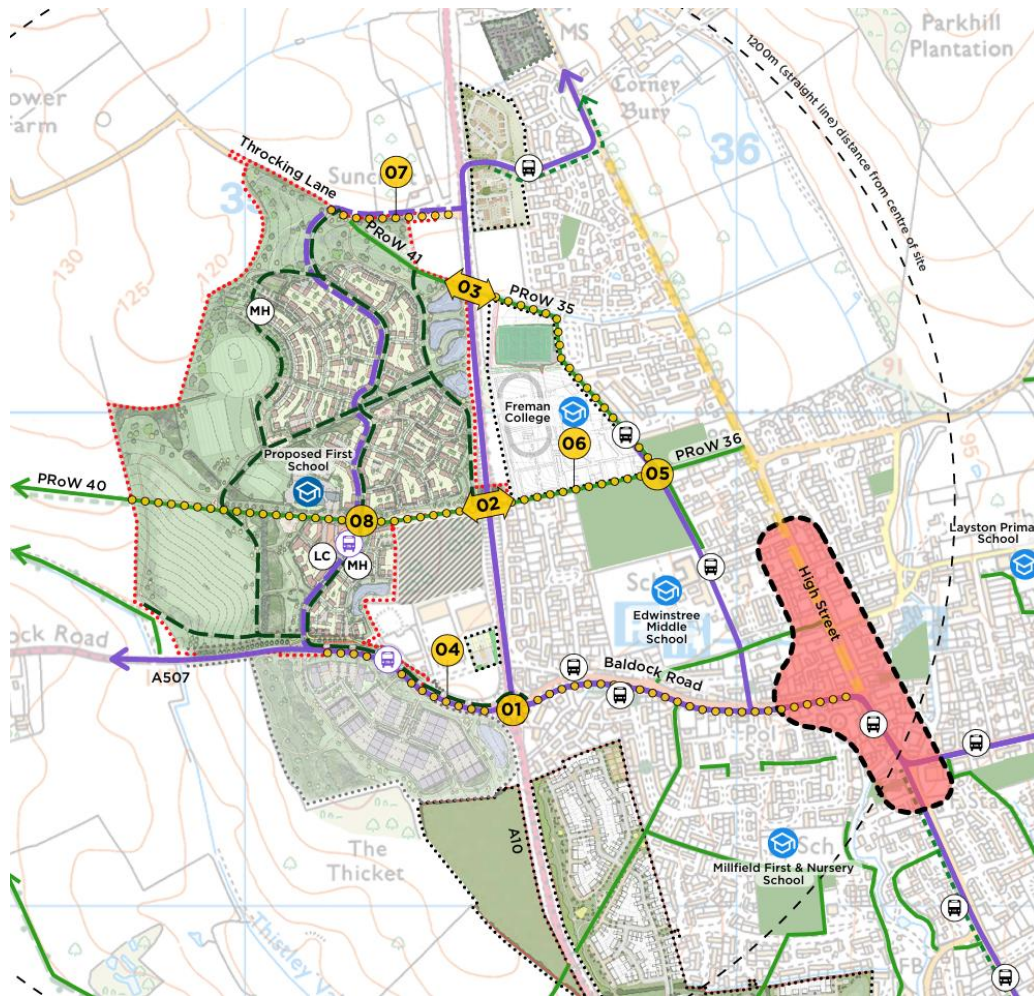


Figure 8.4 – Plan showing future committed and planned built form

8.4. Relevant case studies

A10 / A121 Winston Churchill Way / B198 Lieutenant Way (Cheshunt)

- 8.4.1. This junction is also located on the A10 and within Hertfordshire. The eastern arm (A121 Winston Churchill Way) includes a staggered crossing very similar to that proposed albeit is crossing a dual carriageway so four lanes of traffic need to be negotiated by the active travel users (**Figure 8.5**). This approach is also 40mph. A review of collision records at this crossing on the www.cyclestreets.net web site has not identified any specific collisions relating to active travel users at this crossing between the latest available five year period between 2019 and 2024.



Figure 8.5 – Extract showing Winston Churchill Way approach to A10 / A121 Winston Churchill Way / B198 Lieutenant Way junction (Source Google maps 2025)

Cattlemarket roundabout, Newark

- 8.4.2. This junction is located on the A46 in Nottinghamshire. The eastern A46 arm includes a staggered crossing very similar to that proposed (**Figure 8.6**) and is subject to National speed limit. A review of collision records at this crossing on the www.cyclestreets.net web site has not identified any specific collisions relating to active travel users at this crossing between the latest available five year period between 2019 and 2024.



Figure 8.6 – Extract showing A46 approach to Cattlemarket roundabout (Source Google maps 2025)

Malabar Farm A425 / Staverton Daventry

- 8.4.3. A similar development to the Proposed Development that is currently under construction can be found to the western side of Daventry. The proposals as set out within the original outline planning application (application reference DA20190750) was for the following:

“Outline application (all matters reserved except principal means of access to highways) for a mixed use development including up to 1100 dwellings, a 2 form entry primary school, local centre (A1, A2, A3, A4, A5 & D1/D2 including C2/C3 facilities, associated landscaping and demolition works.”

- 8.4.4. Like the Proposed Development these proposals were for a residential led proposal (albeit larger than the Proposed Development) with associated primary school and local centre facilities. In addition, the location of this development is very similar to the Proposed Development in that it is located on the edge of an existing urban area (i.e. Daventry) with the development being constructed on the western side of an existing A road (i.e. the A45 Stefen Way) and previous existing urban edge located the eastern side of this A road. A site location plan as extracted from Figure 1 of the original Transport Assessment (as produced by WYG in August 2019) is shown in **Figure 8.7** below.



Figure 8.7 – Land at Malabar Farm A425 / Staverton Daventry site location

- 8.4.5. Details of the movement strategy have been extracted from the relevant movement plan as produced by Define (Drawing reference DE309-012 Rev F) and is set out in **Figure 8.8** below. The proposed active travel strategy for the proposals involved tie in to the existing shared pedestrian / cycle bridge that provided a connection to the western side of Daventry at the Staverton Road / Thames Road junction. This active travel bridge is very similar to the proposed parallel active travel bridge that would link in with the Proposed Development albeit due to the level differences includes spiral ramps which lengthen crossing distances across the A45.

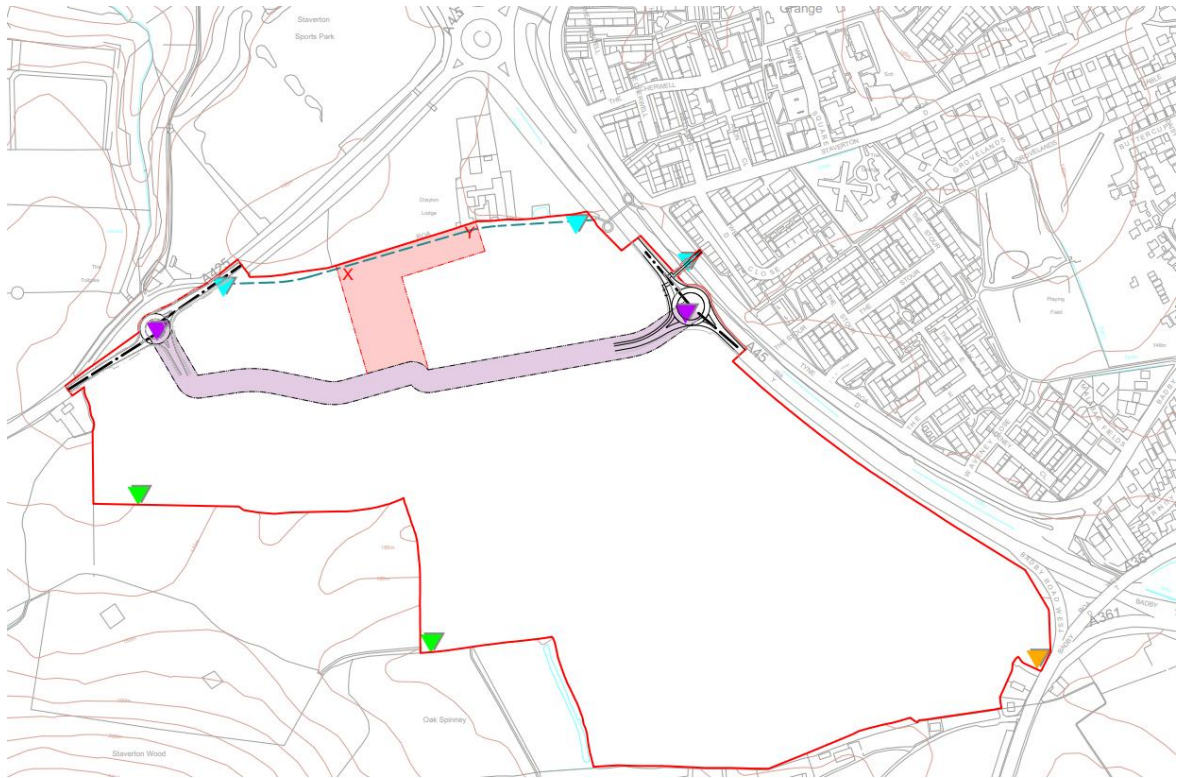


Figure 8.8 – Land at Malabar Farm A425 / Staverton Daventry Movement Plan

- 8.4.6. More crucially, and again very similar to the Proposed Development (i.e. across the A10) the development also includes an at grade crossing in the vicinity of the proposed access roundabout with the A45 (which like the Baldock Road roundabout is approximately 50m in diameter). The details of this at grade crossing is shown on the extract of the access plan (**Figure 8.9**) as extracted from the approved WYG vehicle access drawing (Drawing number A105109 35 12 013 Rev A). Moreover, it is noted that, similar to the Proposed Development, the frontage on the A45 where the crossing is proposed was subject to national speed limit (i.e. similar to the A10 and A507) and was converted to 40mph.

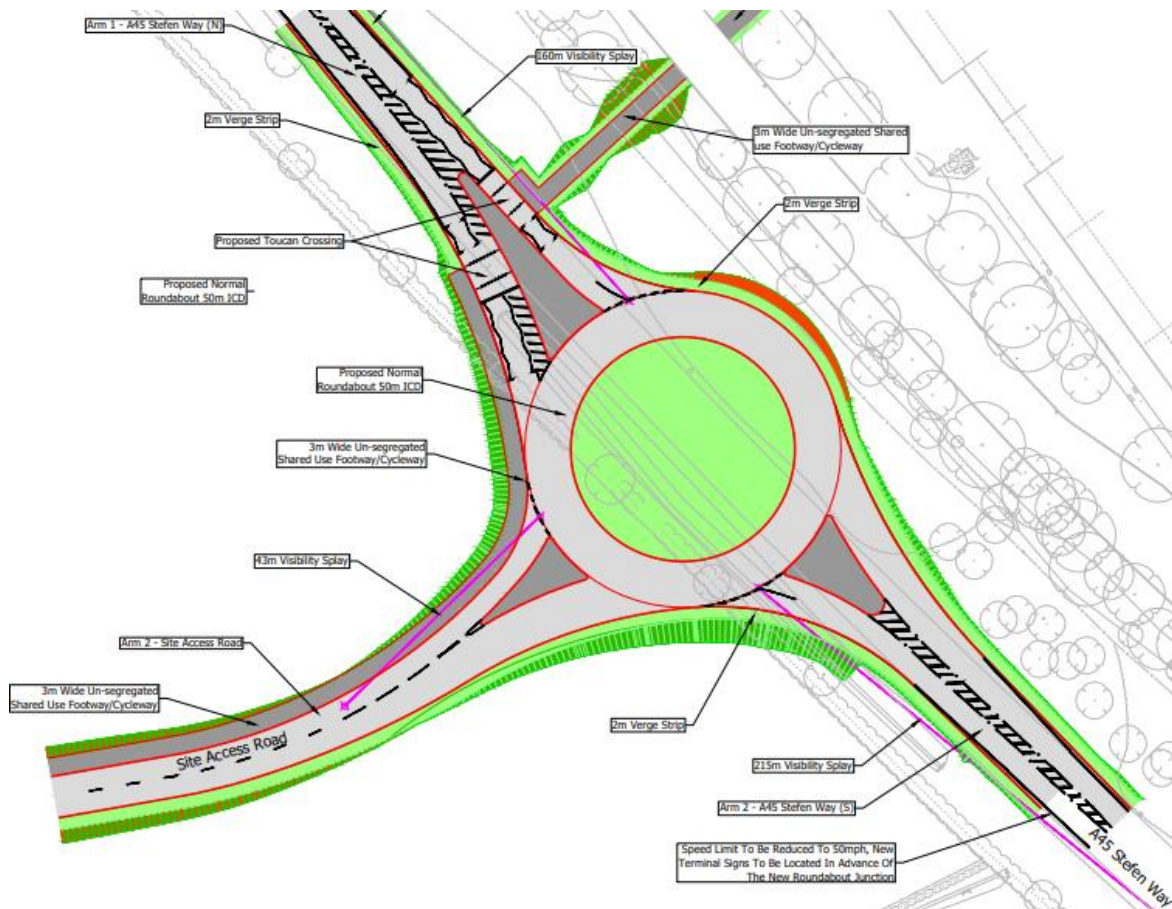


Figure 8.9 – Land at Malabar Farm proposed access

- 8.4.7. Thus, this therefore presents evidence that development has been consented, similar to that proposed, that both includes staggered at grade crossings on an A road and coordinated speed limit change.

Case study summary

- 8.4.8. The above case studies demonstrate that there is precedence (including in Hertfordshire) for the siting of a Toucan crossing on an A road in proximity to a roundabout. Moreover, the case study in at Malabar Farm also demonstrates that this continues to be a strategy employed to connect new urban extensions across A roads in a similar way to that proposed at Buntingford.

8.5. Further design work post signing of HSoCG

- 8.5.1. As discussed in **Section 5** further discussions have been held with the LHA in relation to the at grade crossing. In these discussions the LHA confirmed that they would be willing to consider further design options. During these discussions the LHA confirmed the following required main changes to address their concerns:

- They confirmed they consider the exit / entrance crossing would need to be set back. Furthermore, they have requested that the setback on the exit should be further than 20m and should be based on model assessment of queuing at the crossing when stopped.
- The LHA have stated that the crossing should be designed on the assumption that a 40mph speed restriction is not in place on the A10.

8.5.2. Whilst, for the reasons already identified, these changes are not considered necessary, further designs have been submitted to the LHA for consideration.

8.5.3. These designs have included the following changes:

- The exit crossing has been set back 30m from the roundabout. To note this would extend the crossing beyond the 20m as advised by DMRB CD 116 (**CD 10.29**). However, as I have set out earlier in this Section this guidance is preceded by 'should' and therefore can be varied without departure from standard. Furthermore, an additional 10m in stagger (i.e. above 20m) is unlikely to result in significant build up in traffic speed on approach to the crossing beyond a 20m proposal.
- Movement of the entry crossing further north (20m back from the roundabout) to move it closer to the exit crossing.
- Provision of details to show that appropriate visibility could be achieved to a primary signal head even with the existing speed designation and not including for the fact that cars would in any case slow on approach to the roundabout.
- The introduction of guard railing either side of the crossing to direct users to the crossing position.

8.5.4. It is noted that the visibility to the crossing signal head is shown as 215m in consideration of the signed speed and guidance as set out within DMRB document 'CD109 – Highway link design' (**CD 10.32**) that recommends this level of visibility on roads with this speed. However, the recorded speeds on approach to the roundabout from the north are just over 30mph (i.e. 30.6) as shown in **Table 8.1**. This approach speed demonstrates visibility requirements in accordance with Manual for Streets (**CD 10.1**) standards which requires approach visibilities of just over 40m for this recorded speed. In this regard it is evident that the visibility marked on this plan demonstrates that significant approach visibility is achievable well above the required standards. Furthermore, as I have set out above, the reduction in speed on approach to the roundabout also highlights the traffic calming feature of this junction, which is why the implementation of a 40mph speed limit is not required (i.e. given that traffic is already slowing in this regard).

8.5.5. This design has also been submitted to the original approved safety auditor for review. The auditor has subsequently provided an addendum audit (**Appendix W**) for this drawing, which includes the drawing as Appendix A of this document. This audit again has identified no safety issues in section 2 but has raised the following observation in the 'Issues outside the scope of this audit and other observations' section (i.e. Section 3):

“The signing shown indicates to drivers that the provided crossing is for pedestrian use only whereas it will also be used by cyclists. As part of the detailed design the warning signing should be amended to ensure that approaching drivers are also warned for the potential for cycle crossing movements.”

- 8.5.6. On this basis a minor amendment has been made to the pedestrian crossing sign to also notify drivers of crossing cyclists. The revised drawing is included as **Appendix X** of my PoE.
- 8.5.7. Following LHA comment a localised model has been produced of the exit crossing to consider the length of vehicle queue once the pedestrian phase is called. This model is included as **Appendix Y** and assessed the impact at this crossing of the cumulative development (i.e. the appeal site and employment site) against the agreed forecast year, The traffic figures of this model are based on those agreed with the LHA as submitted in Technical Note 11 (**CD 2.10.i; 2.10.ii; and 2.10.iii**). To note the traffic flows are not altered on this approach in the Sensitivity test models discussed in **Section 4** of my PoE given that the increase in northbound movements are forecast to use Throcking Lane junction and not the Baldock Road route.
- 8.5.8. A 7 second crossing time has been assumed for pedestrians in the pedestrian crossing traffic model. This is based on a typical crossing speed of 1.2m/s and includes a 2 second buffer margin as recommended within Chapter 6 of the Traffic Signs Manual (**CD 10.33**). A reasonable assumption has been made that 4 pedestrian calls would be made every two minutes within the traffic model, however, in reality the crossing could be called more regular as long as the traffic queue on approach is allowed to dissipate before the next call.
- 8.5.9. I extract below a queue graph (**Figure 8.10**) showing the build up of traffic queue on call of the pedestrian crossing in the peak hour with the largest queue (i.e. the PM Peak). This shows that whilst a 7 second pedestrian crossing time has been assumed in reality the time between traffic red and traffic green is 17 seconds as further margin is built in as appropriate (i.e. following the stopping of a traffic red phase and the start of pedestrian crossing signal, and the stop of pedestrian crossing signal and vehicle green).

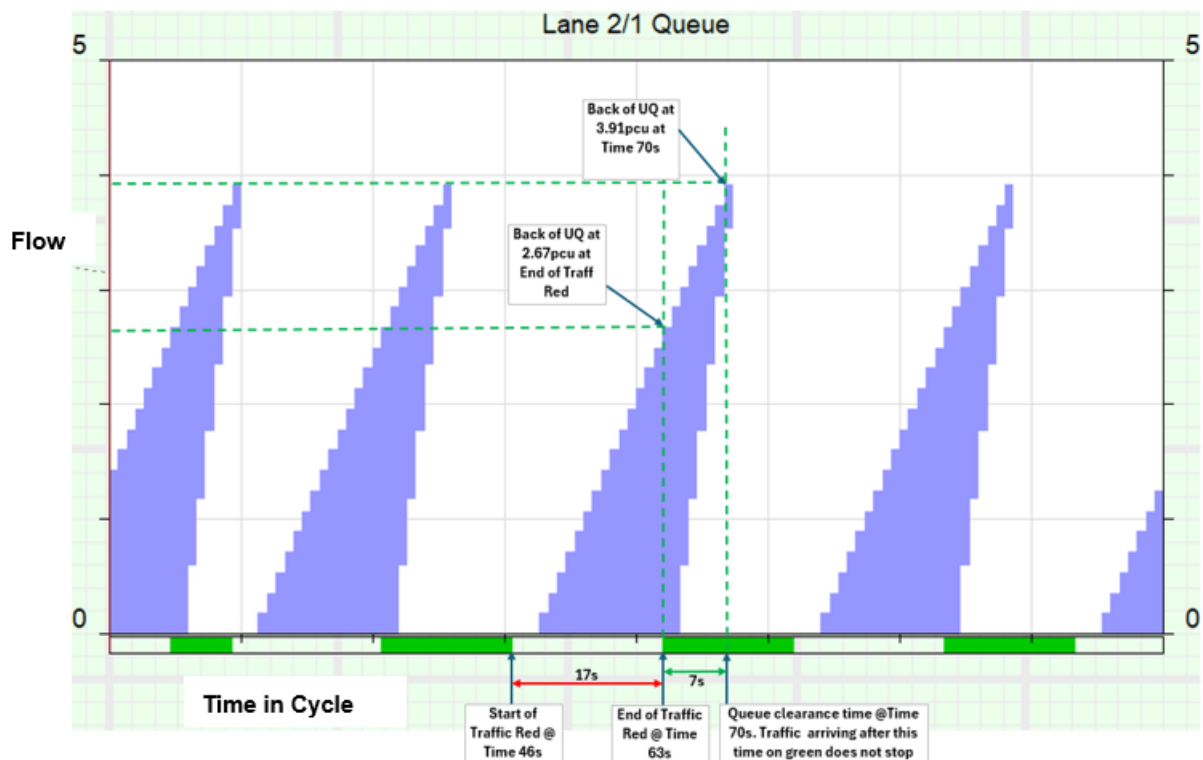


Figure 8.10 – Extracted model queue graph from exit crossing model (PM Peak)

- 8.5.10. The queue graph shows an overall queue of 2.67 passenger car units (pcus) at the end of the traffic red phase, and, once the vehicle lights have turned green, an additional 1.24 (pcu) of roll up queue adding to the back as vehicles slowly build up speed. Based on a standard queue length of 5.75m as advised within Department for Transport guidance 'Tag Unit M3.1 – Highway Assignment Modelling' (**CD 10.34**), this queue would be 15m in length following the red phase and 22m prior to full clearance.
- 8.5.11. The proposed setback of 30m would be sufficient to store the modelled queue as per the LHAs requirements. To note however I would not consider that it is necessary to store the full queue and I consider the crossing exit setback (i.e. 10m) as shown in the original access drawing (**Appendix G**) would also be appropriate. In this scenario whilst traffic at Baldock Road West may need to give way (as it already does for circulatory traffic) this would only be for a short period of time to wait for a queue beyond 2 pcus (i.e. above the storage provided by the offset) to clear. To note the circulatory carriageway at approximately 10m in width also provides space for right turners turning into Baldock Road East from the A10 South to pass any movements exiting to the A10 north arm that would be queuing. In addition, there is good visibility around the roundabout that would allow drivers, who would be travelling at lower speeds due to the traffic calming effects of the junction both on approach and within the circulatory carriageway, time to respond to this approaching queue accordingly. Thus, whilst this drawing has been adjusted in consideration of LHA comment the original at grade crossing design would also provide suitable crossing setback in my opinion.

- 8.5.12. To note the LHA have not confirmed approval of the drawing and have not provided formal response in this regard. Notwithstanding, this again presents further evidence of the flexibility of options in this area.
- 8.5.13. To confirm as I have set out in my PoE the original design as set out in **Appendix G** is both safe (as also confirmed by the RSA) and suitable in design terms and can therefore be introduced as a crossing solution at this junction. However, as an alternative, the additional design (i.e. within **Appendix X**) would also be safe (again also confirmed by the RSA) and suitable in design terms and can be selected as an option for at grade crossing should this be preferred.

8.6. Summary

- 8.6.1. The introduction of Toucan crossings in the vicinity of roundabouts is a common strategy for connection across A roads and I have set out case studies where this is in fact shown. Whilst the LHA has raised comment in relation to the positioning of the crossing and speed limit on approach from the north on the A10 I note that the independent Road Safety Auditor has not raised safety issues with either of these or indeed any other aspect of the design.
- 8.6.2. In addition, I also note that there is significant highway land to reposition the proposed A road crossing. I have set out options in this regard within my PoE. To note these have also been audited again by the previously agreed road safety auditor who again raises no safety issues but also maintains indifference with regards to the preference on crossing location. Thus, I maintain that the concern relating to crossing position is not supported by the evidence and the details of the crossing can be adjusted as part of the design process if preferred by the LHA at S278 stage.
- 8.6.3. In addition, with regards to the approach speed limit on the A10, as I set out, the proposals for a 40mph speed limit has come from the LHA not the applicant. There is a clear sight line to the roundabout and crossing to achieve appropriate visibilities to signal heads commensurate with the existing signed speed. Moreover, the roundabout already acts as a traffic calming feature that slows vehicles on approach and therefore actual visibility requirements are far below this. However, should the speed limit be agreed on this road I consider that it is best located north of Neal Drive as shown, given this access has already added further connection to the A10, and in consideration of future consented and planned built form either side of the A10.
- 8.6.4. Notwithstanding this I have set out an alternative design for crossing in consideration of LHA comment. I consider that this alternative design would also provide appropriate crossing. Furthermore, this design has been subject to safety audit which has not identified safety issue.

9. SUMMARY AND CONCLUSIONS

9.1.1. My PoE has provided response to each of the key identified 'Highway Access and Safety' objection / concerns as raised by the LHA / EHDC which, in summary, encompass:

- An objection to the general principle of A road access for these proposals
- Concerns in relation to the safety audit process
- Concerns as to whether safe at grade crossing, and the associated proposed 40mph approach speed, can be implemented on the A10

9.1.2. My response on these points, as covered in my detail in my PoE, is summarised as follows

- **A road access** - It is evident that the A507 represents a lower order A road and is appropriate for site access. Furthermore, existing precedence exists for access to be accepted by the LHA within Hertfordshire to the A road network for even higher order roads. Thus, there is no specific logical reason that access to the A road network for the Proposed Development should not be permissible in this instance.

Moreover, as I set out above, the impacts of the proposed development are shown to be insignificant (a point also agreed in the HSoCG **CD 15.3**) and therefore far below the threshold considered to be severe. In this regard I would question the need to justify special circumstance for access in any case given it has already been demonstrated that access would not significantly impact operation the concern of which is assumed to be the main reason for introducing the policy restriction in the first instance.

- **Safety Audit** - The RSA has been carried out following an agreed brief using an approved and independent auditor. In this regard I consider that the audit has been delivered comprehensively in consideration of an agreed methodology and includes for specific further consideration as raised by the LHA. Thus, in response to the Matters not Agreed in paragraph 9.6 of the HSoCG (**CD 15.3**) I maintain that the audit process has been carried out comprehensively.

Whilst the LHA appear to argue whether this 'has been finalised to the satisfaction of the Highway Authority' I consider this point to be irrelevant. It is not for the LHA nor I to offer points of consideration, beyond initial briefing, towards the RSA process. To do so would invalidate the impartial nature of the process.

To note no safety issues were identified as part of the audit process. Notwithstanding this, where observations were made these were considered in subsequent revisions to the design where appropriate.

- **A10 at grade crossing and proposed approach speed limit** – as I have set out in my PoE the type of crossing proposed is common across the UK including at more major road connections. Furthermore, whilst the LHA have raised further comment relating to the employment proposals with regards to the position of the crossing and approach speed limit, these have not been raised as safety issues by the independent road safety audit. Moreover, I consider these to be minor points in any case given the fact that crossing can

be repositioned and the speed change on the A10, was introduced following request from the LHA and is not a necessary design requirement.

Notwithstanding this I have set out an alternative design for crossing in consideration of LHA comment. I consider that this alternative design would also provide appropriate crossing. Furthermore, this design has been subject to safety audit which has not identified safety issue.

- 9.1.3. Thus, I consider the concerns as raised by the LHA to be unfounded, and, based on the evidence in this PoE, I consider there are no Highway Access and Safety reasons to withhold planning permission.

10. CONSIDERATION OF REVISED NPPF

10.1. Introduction

- 10.1.1. This section provides an update to my original PoE submission in the context of the recent update of the NPPF on the 17th August 2026. The update considers policy TR3 1.c and TR6 of this document which is most relevant to 'Vehicle Access and Highway Safety'.

10.2. Policy TR3 1.c.

- 10.2.1. Policy TR3 1.c. of the NPPF is outlined as follows with consideration of this policy also set out below following this:

"1. So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location:

...

*c. Any significant adverse impacts from the development on the transport network (in terms of capacity and congestion), or on **highway safety**, should be **mitigated to an acceptable degree** [my emphasis] using a vision-led approach;*

..."

- 10.2.2. As I have set out in this PoE the access proposals have been designed in consideration of appropriate design standards and have been subject to an appropriate safety audit that has not identified any safety issues. This access design also prioritises access by sustainable modes.
- 10.2.3. Forecast traffic impact on the highway network has also been assessed and is shown to be insignificant.

10.3. Policy TR6

- 10.3.1. Policy TR6 of the NPPF is outlined as follows with consideration of this policy also set out below following this:

"1. Development proposals that are likely to generate significant amounts of movement should be supported by:

a. A transport statement or transport assessment (depending on the extent and significance of the transport issues involved), which is proportionate to the nature and scale of the development, so that the likely impacts of the proposal for transport can be assessed and monitored; and

b. A travel plan, which indicates how sustainable transport objectives will be delivered, monitored and managed over time.

2. Transport assessments and statements, and travel plans, should reflect the transport vision for the development and the transport strategy for the area in which it is located, and how these are intended to be achieved (including, in the case of travel plans, identifying fallback options if initial measures do not deliver the expected outcomes).

3. In assessing movement patterns and potential impacts, including whether they are considered to be severe, reasonable future scenarios should be considered, taking into account impacts at relevant times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself. Development proposals should be considered having regard to these potential impacts and the other policies in this Framework which are relevant (including TR3, TR4 and DP3(2)(d)).

4. Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion."

- 10.3.2. As I have set out in **Section 5** of my PoE a comprehensive Transport Assessment and Travel Plan has been submitted with further supplementary submissions also provided in discussion with the LHA that have considered the sustainable vision of the proposals. Assessment work presented in these submissions, which considered the multimodal trip generation of the proposals, has confirmed no severe adverse impacts in the relevant peak hour periods. Furthermore, assessment has considered the cumulative impacts of an appropriate forecast horizon year.
- 10.3.3. The Travel plan includes a number of measures to promote sustainable transport behaviour from the very outset. Moreover, the monitoring method allows the travel plan coordinator to tailor their approach within the defined framework to work towards meeting overall targets.
- 10.3.4. To note the impacts of construction would be of a level far below that of the operational impacts of the proposals and therefore would also not be severe in terms of impact. Access to the site can also be managed, through an appropriate Construction Traffic Management Plan (CTMP), so as to be focussed away from residential areas and onto more appropriate routes such as from the A10. In addition, access to the site can also be restricted so that existing traffic peaks are avoided.
- 10.3.5. As I have set out in above in response to TR 3 1,c. the access proposals have been designed in consideration of appropriate design standards and have been subject to an appropriate safety audit that has not identified any safety issues. This access design also prioritises access by sustainable modes.
- 10.3.6. Thus, in consideration of the above I consider the proposals have been reviewed in accordance with this policy and I confirm that the impact of the proposals in terms of transport is not severe.

10.4. Summary

- 10.4.1. As I have set out above, on review of the key policy in terms of 'Traffic Access and Safety' from the updated release of the NPPF, I confirm that the review of the proposals is in accordance with this

policy and that the impacts are not severe. In this regard my evidence and conclusions as set out in my previously submitted PoE remains unchanged.



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