Land South of A507, West of A10 Buntingford

784-B077665

Proof of Evidence of Peter Blair on Sustainability and Accessibility from a Highways and Transportation Perspective

In Respect of '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.'

Land South of A507, West of A10 Buntingford

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On behalf of Hallam Land Management Ltd

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1.0 Introduction

1.1 Preamble

1.1.1 This Highways and Transport Proof of Evidence has been prepared by Peter Blair, Head of Transport North at the international consultancy Tetra Tech. It describes my Highways and Transport evidence, considerations and findings, focusing on the areas of Sustainability and Accessibility.

1.2 Experience of Witness

1.2.1 My name is Peter Blair. I have a degree in Civil Engineering and a diploma in Industrial Studies, both from the University of Ulster. I am a Chartered Engineer, a Fellow of the Institution of Civil Engineers and a Fellow of the Chartered Institution of Highways and Transportation.

1.2.2 I am Head of Transport North at the international consultancy Tetra Tech (TT). I have over 35 years' experience of working in the field of traffic engineering, acting both for Public Authorities and Private Clients.

1.2.3 I am familiar with the development site and the highways, transport and active travel conditions in the local area. I was the expert witness on transport related accessibility and sustainability matters on behalf of the Appellant at the recent Inquiry (PINS Ref: 6008238, LPA Ref: 3/24/0966/OUT).

1.2.4 My evidence is given in accordance with the requirements of my professional bodies. I can confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

1.3 Appointment

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

1.3.2 My evidence should be read in conjunction with the Highways and Transportation evidence of Mr Duffy and other evidence prepared by the Appellant.

2.0 Scope

2.1 Background to the Appeal

2.1.1 This Appeal follows the refusal by East Herts District Council (EHDC), the LPA, with regard to the application for planning permission for the following Proposed Development ("the Appeal scheme"):

'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.'

2.1.2 A full summary of the background to the Appeal is set out within the appellant's planning Statement of Case (SoC).

2.1.3 The site is currently agricultural land south of the A507 and west of the A10 in Buntingford. The whole extent of the scheme is located within the administrative boundary of East Herts District Council.

2.1.4 A comprehensive suite of technical reports and plans were submitted with the application in line with East Herts District Council's validation requirements. The documents submitted during the course of the application are scheduled in the Core Documents List. The highways and transportation work which accompanied the application was undertaken by the consultancy Jubb, who were later acquired by Ridge. From this point onwards in my Proof, I will refer to 'Jubb' as 'Ridge', for consistency.

2.1.5 Ridge submitted a Transport Assessment (TA) (CD 1.15), Technical Note (TN) (CD 2.11, 2.12 and 2.13) and Framework Travel Plan (FTP) (CD 1.16) and the LHA were consulted through the process and have provided consultation responses, to which Ridge have prepared further technical work. I have reviewed their work.

2.1.6 Mr Duffy of Ridge also provides evidence to this Appeal on the transport matters related to the traffic impact and highway design elements of the proposals.

2.1.7 The outline planning application for the site was received and validated and given the planning application reference 3/24/1255/OUT. The case officer at the Local Planning Authority (LPA) prepared a report for the planning committee and recommended that the application should be refused.

2.1.8 The Case Officer's Report to Committee (CD 6.2) raised concerns regarding the site's separation from Buntingford, its likely reliance on private car travel, the quality and attractiveness of the proposed active travel connections, and highway safety issues associated with the proposed toucan crossing of the A10. The report concludes that the site would be perceived as being physically isolated and severed from the rest of the town, inaccessible via sustainable modes and therefore dependent on the private vehicle, and that the proposals amount to significant development at a location which cannot be made sustainable.

2.1.9 Hertfordshire County Council (HCC) are the Local Highway Authority (LHA). The LHA raised concerns on the proposals on the grounds of road safety, with particular reference to the toucan crossing of the A10.

2.1.10 The Planning and Highway Authorities have subsequently (9th October 2026) confirmed that they have dropped their case and will not be providing evidence.

2.1.11 Prior to that, at the Case Management Conference (CMC) it was agreed that there were 4 main issues, which comprised of the location of the site in relation to policies and sustainable travel, the effect of the scheme on highway safety, whether the scheme is needed for employment and landscape character.

2.1.12 It should be noted that these are similar issues to those which the LPA and LHA raised in relation to the recently Allowed Appeal for a residential scheme (directly opposite this Appeal Site), (PINS Ref: 6008238, LPA Ref: 3/24/0966/OUT), where the Planning Inspector concluded that the residential site would be seen as being physically well related to Buntingford and in respect of transport "*the proposal would not cause harm to matters of highway safety; would provide the necessary infrastructure to make the development acceptable; would suitably promote and prioritise active travel; would provide a choice of sustainable modes of transport including socially safe and quality walking, wheeler and cycling routes; and would make a suitable modal shift towards reducing car usage. Given the package of proposals, the development would not result in reliance on the private car for day-to-day journeys. Some of these matters are necessary to make the development acceptable, although to the extent that they lead to wider community benefits I have attributed positive weight to them in the overall planning balance.*"

2.1.13 I appeared at that Inquiry and gave evidence on behalf of the Appellant, consistent with that which I now provide in respect of this Appeal.

2.2 Common Ground

2.2.1 As of Mid-October, the Planning and Highway Authorities have dropped their objections and have confirmed that they will not be contesting the Appeal.

2.2.2 They have also confirmed that they will not be engaging in a Highways Statement of Common Ground for this Appeal. At the time of finalising this proof, a Planning Statement of Common Ground (PSoCG) which includes the Authorities position on Highways is in final draft stage but is not yet signed. It is hoped that the PSoCG will be a Core Document before this Inquiry. In its final draft current stage, it confirms that:

- Para 1.5 – The first Reason for Refusal (RfR) must fall away. The Council and the LHA will not contest this reason or support the RfR.
- Para 1.6 - It therefore follows that planning permission should be granted for the Appeal Scheme as the proposals would constitute sustainable development under the NPPF, and this represents a significant material consideration which indicates that the Appeal should be allowed.
- Para 5.19 – The Council does not oppose or contest the position that the development is physically well related to the Settlement and is of a scale of which is in principle can be

accommodated, taking into account the existing or proposed availability of infrastructure in accordance with NPPF Policy S5 j1, subject to conditions and S106 agreement.

- Para 5.24 - It has been found by the Planning Inspector in the recent Appeal decision (REF: 6008238) that the proposed active travel provisions and toucan crossing over the A10 (which are the same as the Appeal Scheme) are compliant with Local Planning and Transport Policies. Their delivery is secured by way of subject to detailed conditions/s278 agreement. The parties do not dispute these findings.

- Para 5.49 - The LHA and Council does not seek to oppose the proposed active travel improvements or toucan crossing subject to the southern site Appeal, which have been found to be acceptable in general accordance with Local Transport and National Planning Policies.

2.2.3 I note that the PSoCG is not signed at the time of finalising this Proof, so I therefore also set out points which were agreed on the adjacent residential site Appeal, and also points which the Council did not agree with but which the Inspector of that Appeal has determined.

2.2.4 Those are documented within the Highways Statement of Common Ground and the Decision Letter for the residential inquiry (CD 10.20 and CD 7.1). Key transport and highways matters which are agreed or determined are set out within Sections 3.3 and 4.2 of my evidence.

2.3 Focus of my Evidence

2.3.1 As the Inquiry will still be heard by the Inspector, my evidence relates to the topics of accessibility and sustainability from a highways and transportation perspective. Those areas encompass the Inspectors main points of location in relation to policies and the Authorities points on sustainable travel, active travel and isolation.

2.3.2 I interpret the transportation points to basically be whether or not the proposals are physically well related to the Settlement and constitute sustainable development and whether the site is acceptably accessible.

2.3.3 Whilst my evidence presents points on their own merits, I also cross reference relevant points to which the LHA were in agreement for the residential Appeal and also relevant points which were established by the Inspector at that Appeal Inquiry.

2.3.4 I also refer to the draft Planning Statement of Common Ground which is being worked up for the Employment Appeal at the time of finalising this proof.

2.3.5 My evidence does not address traffic impact, highway safety and operation or matters of detailed design. Separate evidence has been prepared by Mr Duffy of Ridge, which covers matters related to the traffic impact and highway safety elements of the proposals.

3.0 Overarching Context of the Appeal

3.1 Reasons for Refusal and Cited Policy Conflicts

3.1.1 I have reviewed Decision Notice (CD 6.1) which refuses the outline planning application. As previously mentioned, as of 9th October, EDHC and HCC have dropped their case.

3.1.2 Reasons for Refusal (RFR) 1 and 3 contain reference to sustainable travel, accessibility or cited policy conflicts relating to transport and highways. I set those out below.

3.1.3 RfR1 states:

"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)."

3.1.4 RfR3 states:

"The proposed development results in a conflict with Policies BUNT3, INT1, DPS2, GBR2, DES2, ED1, TRA1 and TRA2 of the District Plan (2018) and Policies ES1 and BE2 of the Buntingford Community Neighbourhood Plan (2017). Thus, the proposals fail to comply with the Development Plan as a whole. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the harms and policy conflicts identified are considered to significantly and demonstrably outweigh the benefits of the proposals in terms of delivery of new employment floorspace and other public infrastructure, having regard to NPPF paragraph 11d, which forms another material consideration. As such, the proposals fail to constitute sustainable development and would therefore conflict with the National Planning Policy Framework. The application of the tilted balance does not constitute a further material consideration which indicate a decision should be made otherwise than in accordance with the Development Plan."

3.2 Inspector's Main Issues

3.2.1 Following the CMC, the Inspector confirmed that the main issues were as follows;

- *The location of the site with reference to national and local policies*
- *The effect of the Appeal scheme on highway safety*
- *Whether or not the scheme is required to meet employment needs, and*
- *The effect of the scheme on the landscape character and appearance of the area*

3.2.2 The first two bullet points can be considered to relate to highways and transport.

3.2.3 My evidence has been produced with a focus on the accessibility and sustainable travel elements of the site and the proposals, whilst the evidence of Mr Duffy deals with the highway safety elements of the Appeal.

3.3 Views of the Local Highway Authority

3.3.1 As of Mid-October the Planning and Highway Authorities have now dropped their case and no longer hold the views below.

3.3.2 Prior to that, the LHA provided four consultation responses (CD 4.11) (CD 4.26) (CD 4.30) (CD 4.31) which responded to the appellants submissions including additional information and updated proposals.

3.3.3 In the final consultation response of March 2026, the LHA's position was to re-state the position in their February 26 Consultation response and recommend refusal of the application. I have summarised their reasons below:

- The LHA consider that in the current and future environment, an at-grade crossing of the A10 is inappropriate;
- The LHA have safety concerns regarding the proposed toucan crossing;
- The LHA consider that the RSA does not correctly identify problems, nor does it propose solutions as per standards; and
- The LHA have safety concerns regarding the proposed extension of the 40mph speed limit on the A10.

3.3.4 Those reasons given by the LHA relate to highway safety elements of the proposals, including the toucan crossing design and the implications of the proposed speed limit reduction. It is notable that none of those reasons include the locational and sustainable travel aspects or wider active travel aspects as appear in the RfR1 and RfR 3, and which have subsequently been found to be acceptable by an Inspector in relation to the recent adjacent residential approval.

3.3.5 Highway safety matters are dealt with at this Appeal by Mr Duffy and those matters were discussed in depth during the Appeal Inquiry for the Appellant's recently approved residential development on land to the north of the A507 (Pins Ref: 6008238).

3.3.6 With regards to those points, the Inspector in his Appeal Decision for the residential site found that:

- A staggered toucan crossing would be appropriate in this location (CD 7.1 Para 46)
- It would be appropriate to introduce the 40mph limit on the A10 from just north of Neale Drive (CD 7.1 Para 50).
- The (toucan crossing) the proposal would be capable of mitigating any possible risks and conflicts in terms of the safe use of roundabout (CD 7.1 Para 53).
- The proposal would not cause unacceptable harm to highway safety (CD 7.1 Para 56).
- The proposal would accord with the highway safety, traffic management and sustainability requirements of the national decision-making policy TR6 of the Framework and policies TRA1 and TRA2 of the LP (CD 7.1 Para 58).

3.3.7 On the basis of the above findings the Highway Authority no longer objects to the proposals and no longer holds their previously stated views in relation to the employment Appeal.

4.0 Relevant Planning Decisions

4.1 Introduction

4.1.1 This section of my evidence refers to the recent planning decision for the residential development on Land North of the A507, West of the A10, which is adjacent to the employment Appeal site.

4.1.2 My evidence to that Inquiry referred to the Langho Decision, which was a case at which I presented evidence earlier this year. I do not seek to repeat my references to the Langho Decision again here, but it is relevant and is presented in Core Docs CD 15.4 and CD 15.5.

4.1.3 The case particulars, the evidence, and the Inspector's findings on the recent residential approval on Land North of the A507 are of critical significance to this Appeal and should help inform considerations.

4.2 Land North of the A507, West of the A10 – Residential Development (Appeal Ref: 6008238)

4.2.1 The matter of site accessibility was discussed at length at the Appellant's residential development Appeal Inquiry. The matter goes in part, to the subject of site location. Given that the consented residential development site is opposite this Appeal site, and that the proposed offsite infrastructure along the A507 and Baldock Road, including the toucan crossing are identical (with the exception of minor differences at the accesses to serve the southern site, rather than the north) the accessibility findings from that Inquiry are critically important to considerations of the accessibility of this site.

4.2.2 My Proof of Evidence for that Appeal outlines the key considerations relating to travel choice, site location, active travel and sustainability (from a travel perspective) and accessibility of the site. My Proof of Evidence from the residential Inquiry is presented as core documents to this Inquiry, Volume 1: Text (CD 15.4), Volume 2: Appendices (CD 15.5) and Volume 3: Summary Proof (CD 15.6). Subsequently the decision notice (CD 7.1) records how the Inspector has invariably agreed with my evidence.

4.2.3 Locationally, I consider that the Employment site in a slightly better location in terms of sustainable travel, as compared to the residential site. The key difference between accessibility for employment developments in comparison to residential developments is that particularly for pedestrians and cyclists, access to facilities within the town centre or near to the site is less critical for employment sites. For an employment development, access by sustainable travel modes to and from areas of population, from which future employees and visitors of the site could be drawn is more relevant. Other differences are that employment trip directions are tidally opposite to residential developments where the predominant residential trip volumes in the AM peak are departures, whereas employment AM trips are predominantly arrivals, and so on.

4.2.4 There are four primary active travel routes from the consented residential development to Buntingford. Those routes include:

- Via the A507 and Baldock Road; Main access which provides dedicated footway cycleway facilities along the A507 and a toucan crossing of the A10. That is substantially also the key active travel route for the current employment proposals.
- Via the upgraded pedestrian and proposed active travel bridges over the A10 and then along RoW 36;
- Via the upgraded pedestrian and proposed active travel bridges over the A10 and then along Skipps Meadow; and
- Via the proposed stepped footbridge over the A10 towards the north of the residential site and then FP35.

4.2.5 When the residential scheme is built out, those active travel routes will also serve the employment Appeal proposals. Until then the new infrastructure along the A507 and Baldock Road delivered by the Appeal site proposals will be suitable to provide the active travel connections to Buntingford.

4.2.6 Additionally, the residential development proposals divert three bus services (with increased frequencies of the No331 bus service) along the A507 and into the site. Those services will pass the proposed bus stops on the A507 north of the employment Appeal site and will be of service to the employment site when the residential development is delivered.

4.2.7 A further aspect of the residential development is that in delivering 660 homes, it will create a residential population adjacent to the employment proposals, from which employees can be drawn.

4.2.8 When considering the points made by the Inspector in allowing the residential Appeal, it is important to recognise the above aspects of that scheme.

4.2.9 With regards to the accessibility of the residential site, the points which are relevant to considering the acceptability of the Employment Appeal site location and its accessibility, which were confirmed by the Inspector include that:

- The proposed development would be seen as being physically well related to the Settlement of Buntingford (CD 7.1 Para 21)
- A connectivity score of 45 represents a very good baseline and an already well-connected site from an active travel point of view (CD 7.1, Para 60).
- It is possible to walk or cycle to day-to-day amenities and services within the centre of Buntingford within 2km (CD 7.1 Para 59) and that the walking routes to the many amenities and services in Buntingford (i.e., less than 2km) would, from a pure distance point of view, be acceptable to encourage many to travel by foot. (CD 7.1 Para 75)
- It is reasonable that at certain times of the day, or if there is inclement weather, pedestrians or cyclists may choose to use alternate active travel routes (i.e. along Baldock Road or Skipps Meadow, rather than the PRoW network) from the site to the town (CD 7.1 Para 61)
- Some of the active travel improvements would also be of benefit to existing members of the local community (and visitors alike), as well as to those who travel on foot or bicycle to Buntingford Business Park. (CD 7.1 Para 64)

- The proposals would have at least some potential for reducing car journeys relating to visits to and from Buntingford Business Park and the adjacent employment allocation. (CD 7.1 Para 65)
- Good on-site links could be secured at reserved matters stage in conjunction with the consideration of layout matters. (CD 7.1 Para 70)
- The provision of bus services and infrastructure within the site would enable convenient access to and from the site to the town centre, as well as to nearby towns. This would constitute a realistic and sustainable choice for residents in terms of not using the car for such journeys. (CD 7.1 Para 70)
- The Skipps Meadow link would be acceptable, convenient and safe for cyclists and pedestrians alike (CD 7.1 Para 73)
- PRoW 36 would not be unsafe or feel vulnerable for most users. Pedestrians that did not want to use this route at certain times of the day would have other route options available (CD 7.1 Para 77)
- The staggered toucan crossing would not in principle be an unsafe option to facilitate walking or cycling across the A10 and would not cause an unacceptable harm to highway safety, and that it would be used by all users as an active travel route. (CD 7.1Para 79 and Para 81)
- The proposed shared toucan crossing within a 40mph zone is acceptable in principle on the A10 (CD 7.1 Para 37).
- The proposed shared toucan crossing, the proposed 40mph zones and the operation of Baldock Roundabout would not cause unacceptable harm to highway safety (CD 7.1 Para 56), and accords with the highway safety, traffic management and sustainability requirements of the NPPF policy TR6 and policies TRA1 and TRA2 of the LP (CD 7.1 Para 58).
- LTN 1/20 permits a degree of flexibility and does not require perfection (CD 7.1 Para 84).
- The shared cycle/pedestrian route to the west of the Baldock roundabout, would not be unsafe or that users would have the perception of it being unsafe and that there is no reason why this active travel route could not be finally designed so that it felt safe and was safe for all users. (CD 7.1 Para 85)
- The proposed bridge to the north (of the site) would seek to offer an acceptable alternative link for many residents and visitors to the Appeal site, but there would be other options available to those who may have difficulties using steps. (CD 7.1 Para 88)
- The proposed bus infrastructure and services would enable residents of the site conveniently to reach Buntingford by such a sustainable mode of transport, and/or to travel further afield to other towns. (CD 7.1 Para 90)
- The development would be sustainably located and with a good choice of sustainable modes of transport. (CD 7.1 Para 92)
- The active travel proposals would bring forward some of the cycling route improvement aspirations as contained within both the HPROWIP and the East Herts Local Cycling and Walking Infrastructure Plan. (CD 7.1 Para 93)

4.2.10 To summarise those findings, the Inspector found the residential site to benefit from a good baseline level of connectivity, and that the existing services and facilities within Buntingford

are located within an acceptable walk and cycle distance. The inspector confirmed that a 2km walk distance is suitable to encourage journeys on foot.

4.2.11 Additionally, the Inspector found that the proposed improvements would enhance that baseline level of connectivity, providing safe and convenient active travel links which includes the route along the A507 / Baldock Road (and the toucan crossing). Good on-site connections could be secured through the detailed design process.

4.2.12 The Inspector recognised that the individual routes did not need to provide a perfect solution, and that LTN 1/20 allows a degree of flexibility. The Inspector found it reasonable to assume that some users may choose alternative routes from Buntingford to the site during different times of day or during inclement weather.

4.2.13 The existing and proposed bus infrastructure and services would provide residents with a realistic and convenient choice of travel mode to Buntingford and wider towns.

4.2.14 The Inspector concluded that the site is suitably and sustainably located, physically well related to the Settlement, and offers a genuine choice of travel modes which provide opportunities to reduce car journeys.

4.2.15 The Inspector also concluded that some of the proposals, including infrastructure and services, would benefit existing residents of Buntingford and bring forward some aspirations of the Authorities Local Cycle and Walking Infrastructure plan and Rights of Way improvement plan (LCWIP and RoWIP).

4.2.16 The employment Appeal site proposals promote the same active travel route along the A507 and Baldock Road, enjoys a better level of connectivity, and will be served by the existing and proposed public transport services. It is the case that the Appeal site is physically well related to Buntingford and that adequate active travel and public transport accessibility will be delivered.

5.0 Site Location, Physically Well Related to the Settlement

5.1 Introduction

5.1.1 This section of my Proof reviews the location of the site, in relation to the existing Settlement of Buntingford, centres of population, existing facilities and services.

5.2 DfT Connectivity Tool

5.2.1 The Department for Transport (DfT) have launched their "Connectivity Tool". The NPPF advises that it be used.

5.2.2 I have undertaken a review of the Appeal site, in its existing form, using the Connectivity Tool, and the results are presented within **PoE Appendix A.**

5.2.3 The DfT's 'Applying Connectivity Tool' guidance document, included in **PoE Appendix A-2** states that the Connectivity Tool "*combines transport and land use data to generate a national measure of connectivity for any location in England and Wales. This connectivity score measures people's ability to get where they want to go*".

5.2.4 The Connectivity Tool considers not just the ways in which people can travel, but also what services, facilities and destinations are available for them to travel to. Whilst that relates to the site location and connecting via infrastructure and services to facilities, I consider that it also reflects how connected the site is in the tidally opposite case of commuter travel to and from it.

5.2.5 To summarise the findings presented within **PoE Appendix A**, the DfT's Connectivity Tool presents a connectivity score (for all modes of travel except driving) of 48, for the existing site. This means that the site, in its existing form, is 48% as connected, as the best-connected location in England and Wales (a location within Tower Hamlets, London). The residential site in comparison had a connectivity score of 45, which the Inspector regarded as a very good baseline and an already well-connected site.

5.2.6 The Connectivity Tool also has a function which allows the connectivity score for the site to be expressed in comparison to the connectivity scores for East Hertfordshire.

5.2.7 When compared using the 'Local Authority Banding' function, the area on which employment units are proposed sits in Band B, i.e. in the second-best connected tier (in a 10-tier scale) within East Hertfordshire. In fact, part of the north-east corner of the Appeal site is actually located within the Local Authority Band A. The residential proposal was all in Band B.

5.2.8 It is apparent from the extracts presented in **PoE Appendix A** that Buntingford is also the most connected location in the northern half of the District.

5.2.9 It is also possible to run the connectivity tool to assess the connectivity of the site by driving. When that is done, unsurprisingly the site has a very high level of connectivity (76). I appreciate that the councils initially cited negative aspects arising due to the two A-roads, but it is important to also recognise the excellent connectivity by road which the site enjoys. That

assists sustainable car journeys, taxis, public transport, commercial traffic, deliveries, emergency services etc.

5.2.10 East Herts District Council are required to deliver employment opportunities within East Hertfordshire. It is clear from the Connectivity Tool extracts presented in **PoE Appendix A**, that Buntingford, including the Appeal site, is well connected, is one of the best-connected areas within the district, and is the best-connected area within the northern half of the district.

5.2.11 That connectivity will be enhanced further by an on-site layout which will be designed to prioritise pedestrians and cyclists, in addition to the proposed public bus stops on the A507 to the north of the site. Connectivity will be further improved by the provision of the committed bus services, off-site footways and cycleways from the site into Buntingford, speed limit reductions, pedestrian and cycle crossings, traffic calming, public transport funding and Travel Plan measures.

5.2.12 Within the Appeal Decision for the Appellant's consented residential development (CD 7.1), the Inspector noted how that site achieved a Connectivity Score of 45 (except driving) and fell within the East Hertfordshire Local Authority Banding B. In considering that level of connectivity, the Inspector concluded that *"the Appeal site is already well connected from an active travel point of view. In other words, this is a very good baseline to start with when considering the proposed active travel proposals. (CD 7.1 Para 60)"*

5.2.13 The Appeal Site achieves a Connectivity Score three points higher than that of the residential site. On this basis, and considering the Inspectors findings for the residential Appeal site, the employment Appeal Site can be similarly considered to benefit from a very good baseline level of active travel connectivity. The connectivity of the employment site will also increase due to all the active travel links and public transport enhancements which will be delivered by the residential approval.

5.3 Development Outside the Settlement Boundary

5.3.1 Policy S5 of the NPPF advises that various listed categories of development should be approved, unless adverse effects substantially outweigh benefits. In relation to S5 1(j), i.e, development which would address an evidenced unmet need (in this instance employment), development should be physically well related to an existing Settlement and be of a scale which can be accommodated by existing and proposed infrastructure.

5.3.2 A Settlement is defined within the NPPF as "Includes cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete."

5.3.3 A first point to make on this is that the recent approval of the residential development north of the A507 and west of the A10 (Appeal Ref: 6008238), should now also be regarded as part of the Settlement.

5.3.4 It is notable also that Buntingford Business Park is a built-up area, has a recent planning permission and an allocated site. So, that Business Park and the BUNT3 allocation are also part of the Settlement.

5.3.5 The Inspector's Decision Letter for the residential development Appeal concluded that the residential site is physically well related to the existing Settlement of Buntingford for the following reasons (underlined) (all from CD 7.1, Para 21):

- The proposed development would be seen as being physically well related to the Settlement of Buntingford owing to existing and proposed bridges and other transport connections (including active travel links and proposed toucan crossing on the A10 which I later conclude are acceptable in all respects);
- The intervisibility between the site and existing residential/other development close to and off Neale Drive (including also some consented development that has not been built out);
- The fact that there is no intervening countryside between the Settlement edge and the proposed development;
- The proximity of Buntingford Business Park (where the roofs of such development can be seen from parts of the Appeal site);
- The site's existing association with the adjacent proposed employment allocation (accepting that this is yet to be developed);
- The promotion of sustainable patterns of movement between the site and the Settlement utilising roads, paths and services;
- The avoidance of isolated development; and
- The overall close proximity of the development to the edge of the existing Settlement of Buntingford as defined by its boundary in the LP (local plan).

5.3.6 The Inspector stated that "*the location of the development would limit the need to travel by private car, and it would offer a genuine choice of sustainable, quality and safe transport modes for residents and users."* (CD 7.1 Para 92)

5.3.7 With those points in mind, all of which are applicable to the Appeal site, and considering that the Appeal site is actually closer to Buntingford than the approved residential development, I conclude that the proposed development is physically well related to the Settlement boundary, physically well related to existing development, has good active travel links and is well served by existing (and future) public transport.

5.4 Sustainable Sites Within the Vicinity of the Appeal Site

Consented Residential Site on Land North of the A507, West of the A10 (Application Ref: 3/24/0966/OUT) (Appeal Ref: 6008238)

5.4.1 The Appellant has had a recent approval for the development of 600 residential dwellings, 60 units of elderly accommodation, plus onsite facilities including (but not limited to) a mixed use local centre and two mobility hubs which will serve public transport services.

5.4.2 My evidence has set out the Inspector's findings and conclusions in regards to the accessibility and sustainability of that site.

5.4.3 In summarising those findings, the Inspector concluded that the residential development is sustainably located and benefits from a good choice of sustainable modes of transport. Day-to-day amenities and services within Buntingford are accessible by walking and cycling, with a choice of safe and convenient active travel routes available for all users, including alternative route choices for users where appropriate. The proposed active travel improvements, including

connections across the A10, were considered capable of providing safe and suitable access to Buntingford via active modes, while the proposed bus infrastructure and services would provide convenient access to Buntingford and surrounding towns.

5.4.4 The Inspector also recognised that these improvements would benefit the wider community, support access to employment opportunities and have the potential to reduce car journeys.

BUNT3 – East Herts Local Plan Employment Allocation

5.4.5 The RfR1 criticises the accessibility and sustainability of the site location. In this regard, I consider the BUNT3 Allocation to be of relevance.

5.4.6 Policy BUNT3 of the East Herts District Plan is defined as "*3 hectares of land located to the north of Buntingford Business Park has been allocated as an extension to the existing Employment Area.*"

5.4.7 The BUNT3 allocation is located north of the existing Buntingford Business Park, to the west of the A10, and north of the A507.

5.4.8 Paragraph 3.2.8 of the East Herts District Plan 2018 (CD 5.1) states that "*In order to help support jobs growth in the District, this Plan seeks to ensure sufficient provision of land and premises for office, industrial and warehousing uses (B1, B2, B8 uses)* ***in sustainable locations*** *which meet the needs of local businesses."* (**PB Bolding**)

5.4.9 The East Herts District Plan defines the BUNT3 allocation as being in a sustainable location.

5.4.10 To enable the allocation of that location, I would expect that the LPA and Inspector must have been satisfied that;

- The location of the development is not severed by the A10, and/or that severance would not amount to a significant harm which would prevent future development;
- There can be an acceptable level of pedestrian and cycle accessibility between the site and Buntingford, to comply with the safe and suitable access for all users requirements of local and national policy;
- The site location can be acceptably accessible via public transport;
- Future employees and customers would not be unacceptably reliant or dependent on the unsustainable private car to access the site; and
- The site is or can be made sustainable.

5.4.11 Those seem like logical and reasonable expectations and if that is the case, at least the same conclusion should follow for the Appeal site.

5.4.12 The Appeal Site offers further infrastructure improvements in terms of active travel connections (including a toucan crossing facility over the A10), and public transport infrastructure that existing and future users of the Buntingford Business Park and future users of the BUNT3 allocation would benefit from.

5.4.13 In the context that the BUNT3 site and the recently approved residential site are considered to be sustainable locations, I consider that the Appeal site is also a sustainable location. In fact, the proposals further improve connectivity and accessibility between the east and west of the A10, whilst reducing any concerns of severance or isolation. I consider that the Appeal Site location is (and can be made) sustainable in travel terms.

Consented Commercial Development on Buntingford Business Park (Planning Application Ref: 3/25/1986/FUL)

5.4.14 A recent planning application (Ref: 3/25/1986/FUL) on the Buntingford Business Park for the '*Erection of 4 x light industrial units (use classes B1, B2 and B8) with associated parking and external works*' was approved by East Herts District Council on the 14th August 2026.

5.4.15 Those proposals offer no improvements to existing active travel connectivity or crossing of the A10 and it is notable that the LHA did not object to those proposals. Indeed, within their Consultation Response from February 2026, they commented that the site "*benefits from a footway connection into Buntingford, providing links to the local bus network and access to nearby amenities*".

5.4.16 The Core Documents include the application form (CD 10.8), the red line boundary (CD 10.9), site plan (CD 10.10), the LHA's consultation response (CD 10.35) and the Decision Notice (CD 7.4) to aid the Inspector.

5.4.17 The Appeal Site proposals further enhance that connection into Buntingford by providing a 4m wide shared foot/cycleway on the western side of the A10 along the northern side of the carriageway past the Buntingford Business Park. It offers a priority pedestrian/cycle crossing facility over the A507, allowing the foot/cycleway to continue along the southern side of the carriageway and into the Appeal site. In addition, a controlled toucan crossing facility across the A10 is proposed, improving the connection between the development (and Buntingford Business Park) with the town of Buntingford. The proposed 40mph speed limit reduction west of the A10 and the 40/30mph with gateway features east of the A10 would enhance pedestrian and cycling comfort and attractiveness along the route.

5.4.18 Furthermore, bus laybys and stops are proposed on both the northern and southern sides of the A507 in the vicinity of the Appeal site and Buntingford Business Park. This will improve accessibility of the Buntingford Business Park by public transport modes, and encourage use of that mode of travel. In the existing situation, users of the Business Park are required to cross the A10 using an uncontrolled priority crossing.

5.4.19 I consider that the proposals bolster the active travel provision along the A507, improve the connection between the east and west of the A10 and benefit existing and future users of Buntingford Business Park, BUNT3 allocation, as well as the Appeal site.

5.5 Summary

5.5.1 This section of my evidence demonstrates that using the DfT Connectivity Tool, the Appeal site benefits from an existing connectivity score of 48 (for all modes except driving), which identifies that the site is 48% as connected as the best-connected location in England and Wales. The site is also located in Local Authority Band B i.e. the second-best connected banding within East Hertfordshire. The Inspector for the Residential Development Inquiry concluded that a lower connectivity score of 45 (for that site) represented a very good baseline to start from, which is a conclusion that can also be made for the better-connected Appeal site.

5.5.2 Furthermore, the Connectivity Tool shows that the site benefits from a score for Driving of 76. That represents very good connectivity by road, and assists sustainable car journeys, taxis, public transport, deliveries, emergency services etc.

5.5.3 My evidence sets out that the Appeal Site is physically well related to the Settlement, consistent with the requirements of the NPPF in Policy S5 for developments outside of the Settlement. The glossary of the NPPF defines a Settlement to include allocations and consented developments that will form part of the Settlement once developed – and that applies to the approved residential development, the BUNT3 allocation and Buntingford Business Park.

5.5.4 The Inspector of the residential development Inquiry determined that the adjacent residential site is physically well related to the Settlement, and the site is the location of the development would limit the need to travel by private car, and it would offer a genuine choice of sustainable, quality and safe transport modes for residents and users. Those conclusions can also be drawn for the Appeal site, which is in fact closer to the existing Settlement than the residential site.

5.5.5 The BUNT3 allocation, immediately north of Buntingford Business Park, is defined in the District Plan as a sustainable location. Given the Appeal site shares (and enhances) the same transport characteristics that contribute to BUNT3's sustainable location, I consider that the Appeal site should similarly be regarded as being in a sustainable location from a transport and highways perspective.

5.5.6 A commercial development has recently been approved on the Business Park (Application Ref: 3/25/1986/FUL). The LHA raised no objections to this proposal, and in fact stated that the site benefits from an existing footway connection to Buntingford. The Appeal Site will enhance that connection, adding cycling facilities and will improve the crossing facilities over the A10. The Appeal site will also provide bus stops on the A507, west of the A10, which will be of benefit for existing and future public transport users of the Business Park, the BUNT3 allocation and the recent allowed commercial development.

5.5.7 I consider that the site is situated in a sustainable location, that is physically well related to the Settlement, physically well related to existing development, and brings forward wider sustainable travel benefits for existing and future users of the Business Park and future development on the western side of the A10.

6.0 Proposed and Committed Accessibility of the Site

6.1 Introduction

6.1.1 This section of my evidence reviews the proposed accessibility characteristics of the Appeal site and additionally notes the enhancements to accessibility which will be delivered by the recently approved and committed residential development.

6.1.2 I first describe how the proposals build upon the existing connectivity of the site and how the proposals are suitably accessible.

6.1.3 It is relevant to note the recent approval of the residential development. That approval is also required to deliver effectively the same active travel enhancements along the A507 and Baldock Road. Additionally, it creates three further active travel routes, a local centre and enhanced public transport services, all of which would benefit users of the employment Appeal site.

6.1.4 I have also considered the accessibility of the employment proposals in the unlikely circumstances where the residential development does not progress.

6.1.5 To take a wide view of the accessibility of the proposals, it is helpful to consider four categories:

- Digital connectivity, replacing the need to travel;
- On site layout;
- At the interface between the site and the external networks; and
- Onward connectivity.

6.1.6 Prior to considering those aspects, it is pertinent to acknowledge the range of measures which will be delivered by the proposals. To assist in that, I have listed those interventions and measures within **PoE Appendix B**. Those measures are more fully described in Section 7.4 later in this Proof.

6.2 Digital Accessibility

6.2.1 The increase in digital connectivity has had beneficial effects in reducing the need to travel, principally around creating flexibility in working from home and supporting the trend to flexible working hours. It has also reduced the need to access facilities in person. Those aspects serve to reduce traffic generation. Traffic generation and impact is not an issue in dispute at the Appeal, but it is still relevant to note that as a new development, efficient and capable digital connectivity will be provided for the businesses and employees, and so will reduce the need to travel.

6.2.2 That position was agreed with the Planning and Highway Authorities at the residential Appeal and I expect would have been agreed again here if the Authorities had finalised a HSoCG for the Employment Appeal.

6.3 Accessibility of On-Site Layout

6.3.1 In terms of the site layout, the planning application is in outline. It can be ensured at detailed planning stage that the site will be laid out to modern standards, putting pedestrians and cyclists to the fore. The Land use components plan illustrates a Mobility Hub on site.

6.3.2 It should therefore be accepted that the Site will be delivered with an accessible internal layout, in line with the requirements of the NPPF, to prioritise active travel and provide for those with mobility difficulties. That position was agreed with the Planning and Highway Authorities at the residential Appeal and I expect would have been agreed for the Employment Appeal if the Authorities had finalised a HSoCG.

6.4 Accessibility at the Interface between the Site and the External Networks

6.4.1 A key consideration of site accessibility is the nature of the accesses to the site, and the modes of travel which they support. The Illustrative Masterplan (CD 2.8) shows that the Appeal site will have two access points, one of which accommodates all modes, and a second active travel access.

6.4.2 To the north-west of the site, the new, all modes access (the main site access) is proposed off the A507. It forms a three-arm roundabout, designed with flexibility to also accommodate an access into the consented residential development on the land north of the A507.

6.4.3 To the east of the main site access, the Illustrative Masterplan shows an active mode access, located just west of the Buntingford Business Park Junction.

6.4.4 Between those accesses, provision for all modes entering the site is provided. Neither the design of the accesses, nor the access strategy are in contention at this Appeal.

6.4.5 The provision of those two access locations, along with an on-site layout design that will be delivered in accordance with modern standards, putting pedestrians and cyclists to the fore and providing for those with mobility difficulties will serve to ensure that the site will be well connected and accessible to the surrounding networks.

6.5 Accessibility through Onward Connectivity (Active Modes)

Walk Routes to/from the Site

6.5.1 It has long been recognised that walking has the greatest potential to replace short car journeys, particularly those under 2km. This is referenced in Manual for Streets (MfS) (CD 10.1) paragraph 4.4.1. This was also accepted within the Inspector's Appeal Decision for the Appellant's recently consented residential development north of the A507 and west of the A10 (CD 7.1 Para 75).

6.5.2 At the residential Inquiry, I presented published research on how far people do actually walk to services. Research from the National Travel Survey (NTS) data for the UK as a whole, undertaken by Gareth Wakenshaw and Nick Bunn (2017) (attached as **PoE Appendix C**) shows the distances that people do commute for employment.

6.5.3 Their work states that a distance of 2,100 metres, (in excess of 2 km), represents an acceptable maximum walking distance for commuting journey purposes, and a distance of 9.15km represents an acceptable cycling distance catchment for commuting.

6.5.4 These distances are both in excess of the 2km and 5km catchments that are commonly applied for walking and cycling catchments. This further reinforces that a 2km catchment is a reasonable distance for encouraging walking to and from the site.

6.5.5 Given this, I consider the use of a 2km catchment and 5km catchment for encouraging journeys on foot and by cycle to be a robust and acceptable approach. The Inspector for the residential site did not mention the 5km cycle distance but did agree with the acceptability of the 2km walk distance as set out in his Decision Notice (CD 7.1, Para 75).

6.5.6 The whole of Buntingford is within a 5km cycle distance from the centre of the site, and as such I consider that the site is accessible via cycle from all residential areas of Buntingford.

6.5.7 I have undertaken a review of walking distances, using the proposed active travel route along the A507 and Baldock Road. That is set out within Table 1 under Route 1. Plan 1 in **PoE Appendix D** shows the residential areas available within a 2km walk using that route.

6.5.8 The general site location currently has limited accessibility on foot, but when the proposals deliver the active travel enhancements along the A507 and Baldock Road, including the toucan crossing, that accessibility will be significantly improved. The Inspector of the Residential Appeal agreed that those proposed active travel provisions are safe and suitable for all users.

6.5.9 When the committed residential development is delivered, it creates active travel infrastructure through that site and three additional active travel routes (described below and presented **in PoE Appendix D**) from the approximate centre of the Appeal site to the key areas of population within Buntingford. The walk distances via Routes 2a, 2b and 3 are also shown in Table 1 and Plan 2 in **PoE Appendix D**.

6.5.10 Whilst the individual routes to the various residential areas of Buntingford will ultimately use the existing town network of footways, footpaths etc, these routes 1, 2a, 2b and 3 inclusive will be the primary route choices for accessing the site.

6.5.11 **Route 1**; North through the site, joining the A507, then along a new pedestrian/cycleway which will be introduced from the site access along the southern side of the carriageway. There is then a parallel crossing facility over the A507 to where the new pedestrian/cycleway continues along the northern side of the carriageway to a new Toucan Crossing. That new Toucan crossing on the northern arm of the A10 connects to a 3m wide joint ped / cycleway on into Buntingford. The pedestrian/cycleway will be 4m wide to the West of the A10 and to the east of A10 it will be 3m wide. That route provides safe and suitable access for all users as confirmed in the Inspectors Decision Notice of the for the residential site.

6.5.12 In circumstances where the employment site progressed before the residential site, then it would be required to deliver the same active travel route and Toucan crossing between the site and Buntingford. There would of course be differences in where the proposed active travel route connects with the two sites, but otherwise the proposals are identical in terms of active travel along the A507 / Baldock Road corridor.

6.5.13 **Route 2a and Route 2b;** These both share a common route, which travels north through the site, across the A507 via proposed crossing facilities and then north through the consented residential site. On site layouts on both the employment and residential site will be delivered to modern standards to promote walking and cycling. Having passed through the Residential site, both routes offer the option of using either the existing footbridge over the A10 which will be upgraded or the new active travel bridge over the A10 as part of the residential proposals. Once east of the A10, Route 2a follows a straight line, due east along Footpath 36 which is to be improved under the residential proposals, whereas route option 2b turns south and connects to Skipps Meadow, leading to Baldock Road and the active travel infrastructure along Route 1. Route 2a and 2b together provide safe and suitable access for all users.

6.5.14 **Route 3;** North through the employment site, across the A507 via proposed crossing facilities and then north through the consented residential site. The route emerges from the northern part of the residential site to use the pedestrian footbridge over the A10 (proposed as part of the residential development), and then onto footpath 35 which is also to be improved under those proposals. Route 3 provides safe and suitable access for many pedestrians.

6.5.15 The Highway Authority and Planning Authority now take no issue against the suitability of all those routes.

Walk Distances from the Site

6.5.16 Within **PoE Appendix E**, I have measured the distances to the existing and future residential areas within Buntingford, and also nearby facilities (both existing and proposed) which would be of use to future employees and visitors of the Appeal Site for purchasing food, drink and daily needs.

6.5.17 I have split the residential areas into four centres of population (shown in **PoE Appendix E**): to northern Buntingford, central Buntingford, southern Buntingford and the approved 660 homes on Land north of the A507, West of the A10. In measuring the distances to each residential centre, I have taken the approach of measuring from the centre of the Appeal site to the centre of each of those residential areas.

6.5.18 I summarise those distances in Table 1.

Table 1: Summary of Walk Distances from the Employment Appeal Site

	Route 1	Route 2a	Route 2b	Route 3
Northern Residential	1570m	1570m	2610m	1310m
Central Residential	1160m	1520m	1970m	N/A
Southern Residential	1500m	2280m	2310m	N/A
Consented Residential Site on Land North of A507, West of A10	*649m			

*The route from the Appeal Site to the approved residential site on Land North of A507, West of A10 encompasses sections of all routes, and therefore a single measurement has been provided across all routes.

6.5.19 Table 1 shows that:

- Via Route 1, all four residential areas of Buntingford are within a 2km walk from the site.
- Via Route 2a, the northern and central residential areas of Buntingford are within a 2km walk.
- Via Route 2b, the central residential area of Buntingford is within a 2km walk.
- Via Route 3, the northern residential area of Buntingford is within a 2km walk.

6.5.20 The cells that are coloured in Grey with the text N/A, have been considered to be unrealistic route choices given that better alternative routes are present, although they do exist.

6.5.21 In addition to the centres of residential population listed above, **PoE Appendix E** shows that MfG Howegreen is located 369m to the east of the site via Route 1, which contains a Londis (convenience store), Greggs and delivery lockers. Those are facilities which are available to employees of the site. Furthermore, once the approved residential development to the north of the A507 is built out, the local centre which will contain local shopping facilities, will be located within a 410m walk from the centre of the employment site.

6.5.22 These nearby facilities provide a convenient option for future users of the site to purchase food, beverage or daily needs. This reduces reliance on the private car for potential trips before, during and after work.

6.5.23 I consider that given the walk distances provided within Table 1, Route 1 provides a safe and suitable route between the site and Buntingford, and the distances from the key centres of population are within an acceptable range to encourage journeys to work on foot. The route would also be suitable to accommodate cyclists along its extent, and the whole of Buntingford is within 5km of the site, which would encourage journeys via cycle. The Inspector for the Residential Development Appeal confirmed that the route was an acceptable active travel route for all users (CD 7.1 Para 84 and 85). That route is identical to that proposed under the Appeal site proposals (with the exception of a crossing over the A507 and continuation of the foot/cycleway on the southern side of the carriageway, rather than the north).

6.5.24 As such, whilst not necessary to make the development acceptable, Routes 2 (a and b) and 3 would provide an additional benefit in terms of accessibility for journeys via active modes. They would also suitably accommodate active travel to the employment site for residents from the new residential development.

6.6 Accessibility by Public Transport

6.6.1 Future employees or visitors of the site, many of whom are likely to be residents of Buntingford, neighbouring or further afield towns, have the option to travel sustainably to the site via bus.

6.6.2 Buntingford is connected by bus to a range of sizeable surrounding towns, including Baldock, Letchworth Garden City, Royston, Ware, Hertford and Stevenage. Bus services provide residents of those towns an opportunity to access the site sustainably, and within reasonable journey times by public transport.

6.6.3 Bus stops will be introduced along the site frontage. At present the nearest existing bus stops to the site are located on B1038 Baldock Road (opposite Greenways). These are located c. 430m from the centre of the Appeal site via Route 1 (along the A507 and Baldock Road).

6.6.4 Table 2 below shows the existing services which operate from these bus stops. Copies of the existing bus timetables and bus routes are provided within **PoE Appendix F.**

Table 2 – Existing Bus Services from Greenways Bus Stops

Service No.	Route	Frequency		
		Mon to Fri	Sat.	Sun.
Existing Bus Services from Greenways Bus Stops (430m Walk Distance)				
18	Buntingford – Reed – Barley - Royston	6 per day	5 per day	No services
	Royston – Barley – Reed – Buntingford	5 per day	4 per day	No services
331	Buntingford – Puckeridge – Standon – Wadesmill – Ware - Hertford	17 per day	14 per day	7 services
	Hertford – Ware – Wadesmill – Standon – Puckeridge – Buntingford	14 per day	14 per day	6 services
36/36A	Buntingford – Puckeridge – Standon – Bishops Stortford	2 per day *6 stop at High Street	1 service	No services
	Bishops Stortford – Standon – Puckeridge - Buntingford	2 per day *6 stop at High Street	No services	No services
37	Buntingford – Baldock – Letchworth – Hitchin - Stevenage	5 per day	6 per day	No services
	Stevenage – Hitchin – Letchworth – Baldock – Buntingford	6 per day	6 per day	No services

37x	Buntingford – Cottered - Stevenage	2 per day	No services	No services
	Stevenage - Cottered - Buntingford	1 per day	No services	No services

6.6.5 Table 3 outlines the bus journey times from Buntingford to these key nearby towns and villages.

Table 3 – Bus Journey Times

From	To	Duration (Mins)
Buntingford	Baldock	18
	Hertford	48
	Hitchin	43
	Letchworth	24
	Puckeridge	12
	Royston	28
	Stevenage	30 (Bus 37x) 70 (Bus 37)
	Ware	35

6.6.6 Under the proposals of the Appeal site, two bus lay-bys and bus stops will be introduced on the A507, to the north of the proposed development. The Bus service 37, on its existing route, would pass those bus stops. Whilst the on-site layout of the Appeal site is not yet confirmed, the distances from the centre of the site to those bus stops is c. 240m (based on the Illustrative Masterplan).

6.6.7 The new bus stops on the site frontage and the active travel provision between the site and the Greenways bus stops make provision for users of the employment site to access these existing services. That provides public transport accessibility of the site through Bus Services 18, 37, 331, and 36/36A.

6.6.8 The Officers Report to Committee (CD 6.2) acknowledges that the proposed bus stop provision, together with the financial contribution, could address the LHAs initial concerns regarding the promotion of bus travel to and from the site. The LHA have noted that the Appellant will be required to pay a financial contribution in accordance with the HCC Toolkit. The Highways Consultation Response (CD 4.1) states that contribution to be £247,714. This position is further supported by the LHAs latest consultation response, which raises no outstanding concerns in respect of bus travel to the site. The Appellant has agreed to meet the LHA request to provide that Strand 2 Sustainable Travel Contribution.

6.6.9 I consider that the employment proposals are suitably accessible by public transport.

6.6.10 In the committed development scenario, where the recently approved residential site is delivered, there will be significant future public transport enhancements. For that approval, the Appellant has agreed with HCC's Public Transport Unit to divert the bus services 331, 18 and 37 through the residential site, to serve the on-site mobility hub. Furthermore, as part of the

residential development proposals, the Appellant has agreed a significant contribution of £1.5m to allow the bus service 331 between Buntingford and Hertford to be delivered at a 30-minute frequency (with evenings and Sunday services).

6.6.11 When the residential development is delivered, the diversion and increased frequency of those services will result in an additional two services (331 and 18) passing by the Appeal site, (which can use the proposed bus stops). As such, in that future scenario, three bus services will stop at the proposed bus stops, significantly increasing the accessibility of the site by bus, beyond the level which the LHA regard as being acceptable i.e. the level where the residential development and its service enhancements are not present.

6.6.12 This would mean should future employees be residents of Buntingford, Royston, Hertford, Bishops Stortford, Baldock, Letchworth, Stevenage (plus other smaller towns) they will have direct access to the Appeal site by either the 331, 18 or 37 bus services.

6.6.13 Additionally, as part of a separate approval on Land to the East of the A10 Buntingford (Planning Reference 3/23/1447/OUT), (Appeal Ref: 3340497) (CD 7.3 Para 11), it is understood that a financial contribution has been agreed to double the frequency of the existing 18 service from one service every two hours, to a service every hour.

6.6.14 I consider that the existing level of bus provision is acceptable to serve the development. The proposed bus stops, as well as the existing bus stops on Greenways are within a reasonable walking distance to support journeys by public transport. The services that frequent those stops give access to the site from Buntingford and a range of wider towns/villages, at reasonable frequencies, and the Appellant is providing a financial sustainable travel contribution towards sustainable modes of travel. The proposed bus stops provide additional benefits for existing users of Buntingford Business Park, the future BUNT3 allocation and future development west of the A10.

6.6.15 When considering future bus provision as delivered by the allowed residential development, the Inspector concluded that "*The provision of bus services and infrastructure within the site would enable convenient access to and from the site to the town centre, as well as to nearby towns where there is additional choice in terms of employment, shopping or other leisure opportunities. This would constitute a realistic and sustainable choice for residents in terms of not using the car for such journeys."* (CD 7.1, Para 70)

6.6.16 There are also to be the Service 18 improvements brought forward by the allowed development (Planning Reference 3/23/1447/OUT).

6.6.17 The proposed employment development would benefit from those bus improvements as they are brought forward by that site.

6.7 Summary

6.7.1 The matters of connectivity and sustainable accessibility inform considerations of site location.

6.7.2 The proposals will benefit from digital connectivity, which will support home and flexible working, whilst also reducing the need to access services in person, thereby helping to reduce travel demand and peak-period traffic.

6.7.3 With regards to physical connectivity, firstly, it can be ensured at detailed planning stage that the on-site layout will be designed and laid out to modern standards, putting pedestrians and cyclists to the fore.

6.7.4 The Appeal site will be served by a primary all-modes roundabout access of the A507, with an additional active travel access further east off the A507, tying into proposed foot/cycle infrastructure. These accesses ensure convenient, safe and suitable access into the site for all users. This, together with an internal layout designed to modern standards ensures that the site will be suitably accessible for all users, and is suitably connected with the off-site network.

6.7.5 The employment proposals will be primarily accessed via active modes along the committed foot/cycle infrastructure along the A507 and Baldock Road (Route 1). A proposed toucan crossing facilitates safe crossing of the A10. This route is acceptable for journeys on foot and by bicycle, and that view was shared by the Inspector during the Residential Appeal Inquiry. Almost all residential areas of Buntingford area accessible within an acceptable walk and cycle distance.

6.7.6 The employment proposals are accessible by existing bus services, and provide new stops along the site frontage. This will also be of benefit for existing and future users of Buntingford Business Park and the BUNT3 allocation. The existing bus stops on Greenways are within a reasonable walking distance also. The buses 18, 36, 37, 37x and 331 all serve the existing bus stops on Baldock Road, opposite Greenways to the east of the A10 and are within a reasonable walking distance.

6.7.7 The Appellant has agreed to provide a financial contribution of £247k, as requested by the LHA and calculated using HCCs Toolkit, as part of HCCs Strand 2 Sustainable Travel Contributions. Accessibility of the site via public transport has not been raised as a concern in the LHAs latest two consultation responses.

6.7.8 Users of the site will have access to a range of bus services which serve Buntingford and other local towns and villages, at reasonable frequencies, with bus stops within an acceptable walking distance from the site. The LHA did not raise concerns on that level of existing public transport provision in relation to the recently approved employment application ref: 3/25/1986/FUL which is opposite the current employment site.

6.7.9 When the recently approved residential development is delivered, it will additionally provide three active travel routes into Buntingford, local facilities and enhanced public transport services, all of which would benefit the accessibility of the Appeal site.

6.7.10 I consider that the employment proposals are suitably accessible on foot and by cycle via the proposals along Route 1, and further routes will be available once the residential site has been developed. I also consider the existing level of bus provision is acceptable to serve the site, and that will be bolstered by the provision of the proposed bus stops on the A507, and further enhanced by the agreed bus strategies of the consented residential sites.

7.0 Further Considerations on Accessibility and Sustainability

7.1 Introduction

7.1.1 This section of my evidence provides my considerations on what constitutes a sustainable development from a travel and transport perspective.

7.2 Definition of Accessibility within the Hertfordshire Local Transport Plan 4

7.2.1 When considering the travel and locational sustainability issues of this case, the definition of accessibility is important.

7.2.2 Hertfordshire's Local Transport Plan 4 (LTP4) defines Accessibility as "*people being able to access key services at a reasonable cost, in reasonable time and with reasonable ease.*" (CD 10.3, Page 55)

7.2.3 It goes on to say "*Typically key services include employment, education, health and food shopping. Users may be unable to access the key services because of a lack of passenger transport, or because they have mobility problems, a lack of private transport or are unable to afford the costs of travel.*"

7.2.4 The LTP definition of accessibility recognises the role of the private car in providing accessibility. The point to make is that whilst prioritisation of active modes and public transport modes is put to the fore in planning policies, a level of reliance upon the private car for some users is to be accepted.

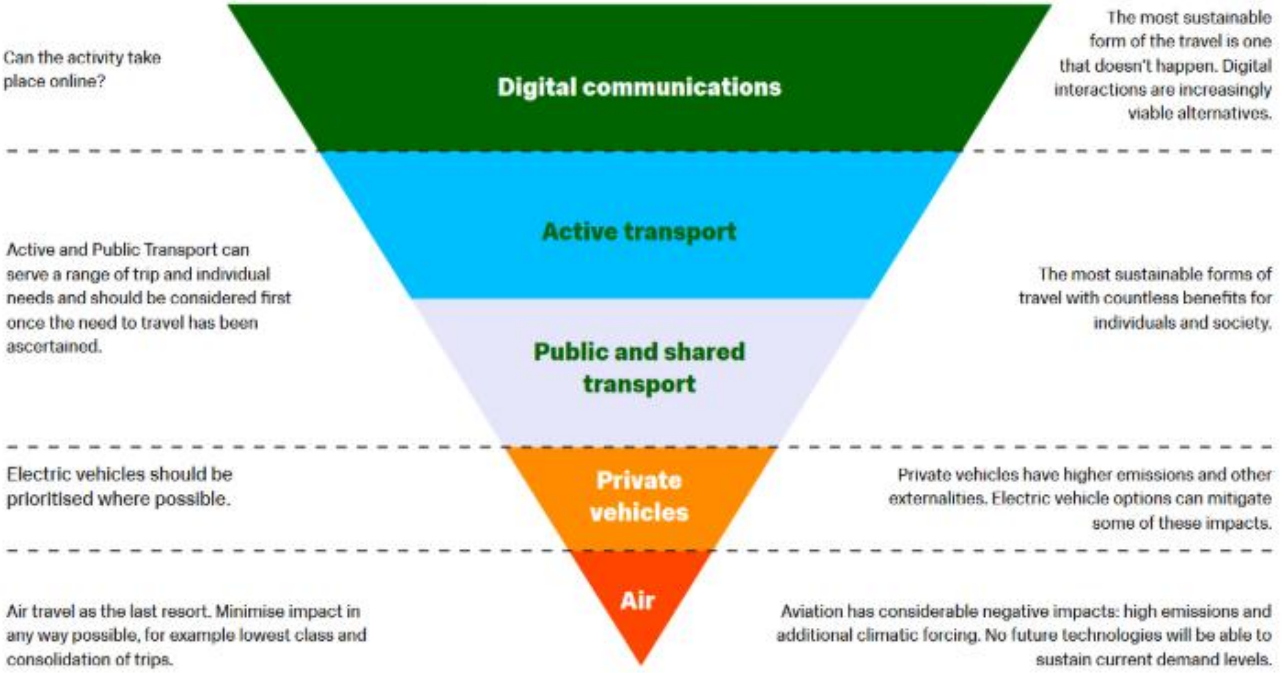
7.2.5 It is also important to recognise that not all private car trips are unsustainable. Ultra-low and zero emission vehicles, as well as multi-occupancy vehicle trips, taxis and buses are sustainable.

7.3 Social, Economic and Environmental Strands of Sustainability

7.3.1 Considerations of what constitutes sustainable development often recognise that there are three strands to sustainability, which are social, economic and environmental. Travel is directly related to the environmental strand, but it can also be linked to the social strand. The point to make is that travel is just one aspect of the many aspects within the three strands when considering whether a development is sustainable. It is not therefore appropriate to declare a development to be unsustainable solely on the grounds of travel.

7.3.2 In considering modes of sustainable travel, it is useful to have the sustainable travel hierarchy in mind. I present an example from Imperial College London below in **Figure 1**.

Figure 1 – Sustainable Travel Hierarchy



7.3.3 Air travel is not relevant to this case and digital communications is the most sustainable mode because it removes the need to travel.

7.3.4 In actual travel terms, the focus of the sustainable travel hierarchy for this development is active travel modes, public and shared transport modes and private vehicles.

7.4 Schedule of Proposed Travel Improvements and Measures

7.4.1 As I set out in a matrix, included as **PoE Appendix B**, the proposals offer 31 elements of sustainable travel improvements and 21 elements of sustainable travel measures (including a sustainable travel financial contribution). In the interests of brevity and to assist cross referencing, I refer to that matrix. Many of those elements will also deliver benefits in accessibility for existing and future residents of Buntingford, notably for existing workers at the Buntingford Business Park, future employees at BUNT3 and the allowed commercial development on the Business Park. Those additional benefits for others should also inform considerations on the subject of sustainability and promoting sustainable travel.

7.4.2 The matrix of infrastructure delivery, improvement and funding shows how the proposals will serve the objectives of:

- Pedestrian infrastructure enhancements
- Cyclist enhancements
- Bus travel enhancements
- Vehicle driver safety
- Non-Motorised User Safety
- A reduced need to travel
- A reduced need to travel by private car
- Benefit to the wider public
- Sustainable travel improvements; and

- Accessibility improvements.

7.4.3 Notably, those improvements are focused on enhancing sustainable modes of travel. I consider that the sustainable travel improvements clearly demonstrate that the proposals will enhance the connectivity and accessibility of the site.

7.5 Prioritisation of Active Travel and Public Transport Modes

7.5.1 A requirement of the NPPF is whether proposals prioritise active travel and public transport, (NPPF DP3 d).

7.5.2 In **PoE Appendix B** of my evidence, I set out a list of sustainable travel interventions, measures and financial contribution. That list consisted of 31 physical interventions and 21 measures (including a financial contribution).

7.5.3 There are no proposed on or off-site works or financial incentives which aim to promote, prioritise or encourage the use of single occupancy, unsustainable private car trips.

7.5.4 The only element which aids car usage is the actual vehicle site access on the A507, which is necessary for a development of this nature, and also supports the use of sustainable vehicles.

7.5.5 When considering the comprehensive list of proposed interventions and measures towards providing the active travel and public transport infrastructure, speed limit reductions, along with a financial contribution of £247,714 towards HCC's Strand 2 Sustainable Travel Mitigations, and the costs of implementing and monitoring the travel plan, it is clear that sustainable modes of transport have been prioritised by the proposals.

7.5.6 The development is also bolstered by a further 11 sustainable interventions from the committed residential site, also shown in **PoE Appendix B**.

7.5.7 The Inspector, in his Decision Notice from the residential development Appeal Inquiry confirmed that development would '*suitably promote and prioritise active travel'* (CD 7.1 Para 166) and that "*the provision of bus services and infrastructure within the site would enable convenient access to and from the site to the town centre, as well as to nearby towns."*

7.5.8 I consider that the Appeal site also promotes and prioritises sustainable modes of travel, and that no prioritisation of the private unsustainable vehicle has been given by the proposals.

7.6 Sustainability of Private Motor Vehicles

7.6.1 It is relevant to consider the category of private vehicle travel more closely. The Glossary of NPPF previously defined sustainable modes of travel to include car sharing and ultra-low / zero emission cars. The current NPPF does not include those specific descriptions but instead refers to "*any efficient, safe and accessible means of transport with overall low impact on the environment….*".

7.6.2 NPPF policy CC2 directs that proposals should provide infrastructure to support the transition to zero emission vehicles. Those are therefore encouraged by the NPPF and are a rapidly increasing proportion of the UK car fleet. Car sharing has also long been regarded as a sustainable form of travel and is encouraged as such in Travel Plans.

7.6.3 It is therefore incorrect to regard all car travel as being unsustainable. Many of those trips are supported as sustainable modes of travel.

7.6.4 In a Vision Led system it is also relevant to look to the future. From 2030 it will not be possible to buy a new car which only has an internal combustion engine, (ICE). Over the lifespan of the development, the ICE car will be a quickly diminishing mode of travel.

7.6.5 The RfR 1 (no longer promoted by EHDC and HCC) implies an unacceptable reliance on the private car by stating the development "*would not provide a genuine choice of alternative travel modes"*.

7.6.6 It follows then, that even in the one strand of sustainability which relates to travel, it is incorrect to equate an alleged "*reliance on the private car*" as something which renders a development unsustainable.

7.7 Reduced Need to Travel

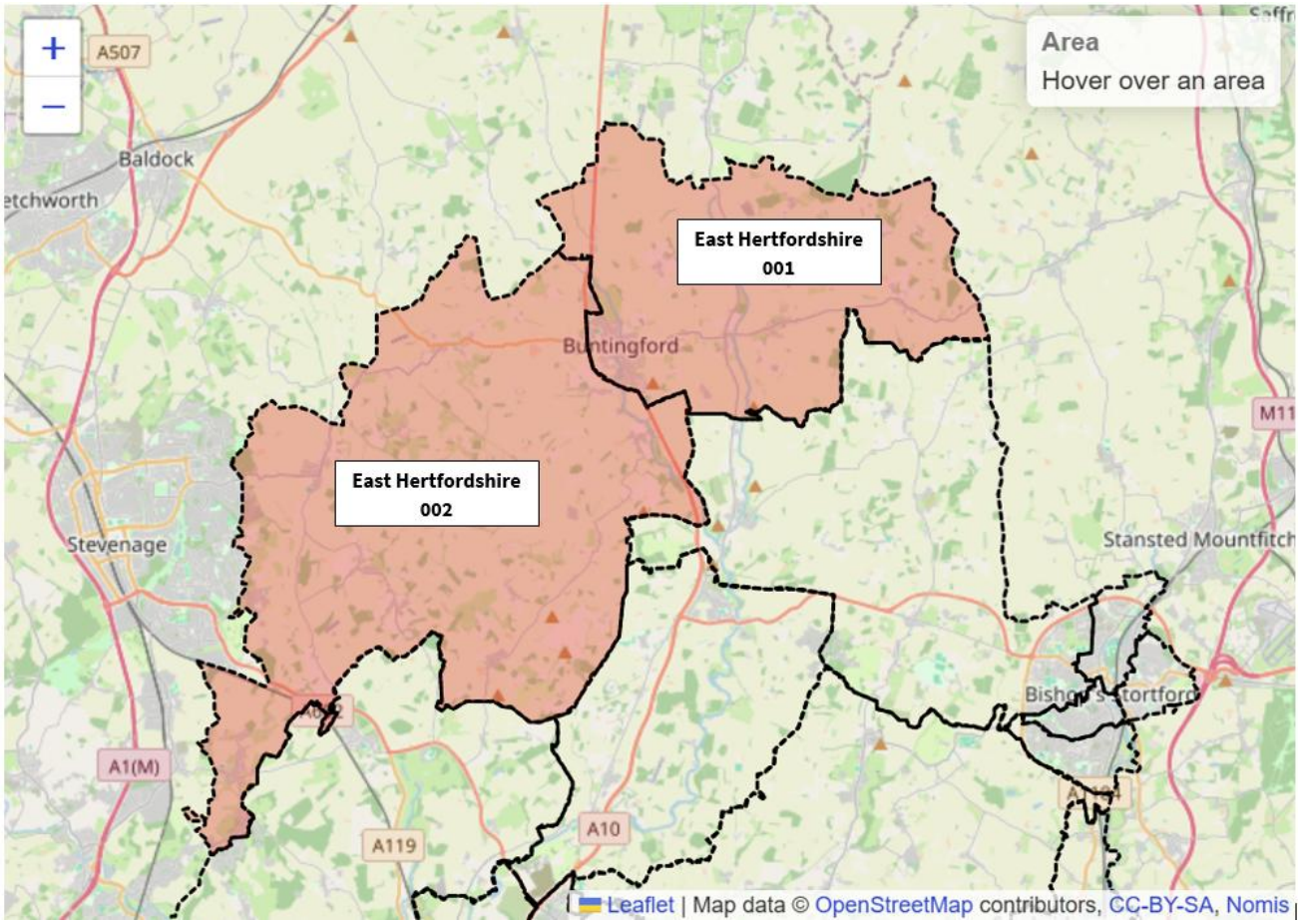
7.7.1 NPPF Policy CC2 1.b states that in order to contribute to climate change mitigation and the transition to net zero, development proposals should "*support good access to facilities in order to limit the need to travel, whether through the developments location, through development densities which improve catchment populations for local services, or by incorporating community facilities and premises to support local employment opportunities."*

7.7.2 In addition, NPPF Policy TR3 1.a states that "*the location (of the site) should limit the need to travel, particularly by private car*…"

7.7.3 I consider that the proposed development achieves the goals of those policies. The location of the site reduces the need to travel in a number of ways, not least by proximity to residential populations. In addition, I have reviewed Journey to Work statistics (ONS, Census 2011) to understand travel patterns to work for existing residents of Buntingford. The data source "WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)" has been analysed, and is attached as **PoE Appendix G**.

7.7.4 Buntingford is located within the East Hertfordshire MSOA 001. The Appeal site is located within East Hertfordshire MSOA 002. This is shown below in Figure 2. Buntingford makes up the significant majority of all homes within the MSOA 001 and as such, I have reviewed where residents of MSOA 001 travel to for work.

Figure 2 – East Hertfordshire MSOA 001 and 002



7.7.5 The data in PoE Appendix G shows that only 14% of East Hertfordshire MSOA 001 residents who commute by car or van to work are employed within MSOA 001 or MSOA 002. 24% drive a vehicle to work elsewhere in East Hertfordshire, and 62% drive a vehicle to work outside of East Hertfordshire.

7.7.6 Locating the site within 2km of the majority of homes within Buntingford, firstly provides job opportunities within Buntingford, and therefore presents an opportunity to reduce that proportion of out-commuting travel. Secondly by placing jobs close to residents it provides the opportunity to replace private vehicles trips with pedestrian and cycle trips to work within Buntingford. Both effects reduce travel distance and travel by car.

7.7.7 The consented residential development north of the A507 will contain 660 homes, and the residents would most likely follow the same out commuting patterns. It was approved without any expectation of there being an adjacent additional employment site. The Employment Appeal site would provide employment opportunities within walking distance of those new homes. The employment proposals again provide a destination which could reduce the need to travel beyond Buntingford for the residents of the already approved residential development.

7.7.8 In addition, the site benefits from existing facilities within a short walk or cycle which future users of the site will be able to visit for purposes such as purchasing food and drink on their lunch break or collecting / sending mail. The MFG Howe Green petrol station, located 369m

from the centre of the site via Route 1, contains a 24hrs Londis (convenience store), a Greggs food store and other facilities such as Amazon Lockers and Evri delivery points, where future employees of the site can purchase groceries, lunch items and collect parcels within a walkable distance. This reduces the need to travel by private car for those purposes.

7.7.9 In the future, the approved residential development will provide a local centre, also within walking distance of the site, which will allow employees of the site to purchase daily needs.

7.7.10 As the site is physically well related to the Settlement, the site location itself minimises travel distances for residents of Buntingford working at the site and for employees of the site wishing to travel to the Settlement. It will not remove the need to make trips, but it does reduce the length of those trips, creates options for non-car travel and hence limits the amount of travel. The site location reduces and limits travel.

7.7.11 A final point to make is that the DfT Connectivity Tool takes into account the ability of users to reach nearby services by sustainable modes of travel. A location with a decent connectivity score therefore reflects the reduced need to travel

7.7.12 In concluding, I consider that the site location, including the proximity of existing and future nearby facilities deliver a reduced need to travel for employees of the site during their working hours. Additionally, the site provides an opportunity to reduce the need for existing and future Buntingford residents to travel outside the town by private car, for employment purposes.

7.8 Framework Travel Plan

7.8.1 The Framework Travel Plan is suitable for the development. The FTP seeks to reduce single occupancy vehicle trips by 15%. In reality, that target will seek to reduce 15% of unsustainable single occupancy vehicle trips.

7.8.2 The FTP sets out that a Travel Plan Co-ordinator (TPC) will be appointed, who will oversee the implementation of the travel plan and its measures. Measures include providing users of the site with travel information through a development website, travel information packs and travel information boards. The TPC will liaise with local bus operators to investigate the provision of bus taster tickets or discounts to staff at the development and will also promote car sharing initiatives such as 'Herts Liftshare', which is a free community carpooling network that connects drivers and passengers across Hertfordshire to share travel costs and reduce emissions. Promotion of a car club scheme would also provide an alternative to car ownership.

7.8.3 Walking and cycling measures are promoted throughout, and those measures, amongst others promoted in the FTP are listed in **PoE Appendix B**.

7.8.4 In summary, I consider the FTP provides a comprehensive list of measures which will seek to promote and encourage active modes and sustainable modes of travel. I consider the target of reducing unsustainable SOV trips by 15% to be realistic and achievable.

7.9 Summary

7.9.1 My evidence has set out that assessing the sustainability of the site is broader than just travel alone, with transport forming only one part of the social, economic and environmental considerations of sustainable development.

7.9.2 The definition of accessibility in the HCC Local Transport Plan 4 recognises the role of the private car in providing accessibility. It is clear from this that whilst prioritisation of active modes and public transport modes is put to the fore in the proposals as advised by planning policies, a level of reliance upon the private car for some users is to be accepted.

7.9.3 The development proposals prioritise active travel and public transport through a comprehensive package of infrastructure improvements, sustainable measures within the Travel Plan and a financial contribution of £247k towards sustainable travel. No proposed measures or interventions prioritise, encourage or enhance the use of single occupancy private vehicle trips.

7.9.4 My evidence has described how not all vehicle use should be regarded as unsustainable. The development supports sustainable travel by accommodating zero-emission vehicles and car sharing, both of which are recognised as sustainable forms of transport. Over time, the use of unsustainable vehicles (internal combustion engine vehicles) will be phased out, and after 2030 the purchase of new ICE vehicles will be restricted. Over the lifespan of the development, the ICE car will be a quickly diminishing mode of travel.

7.9.5 The development reduces the need to travel by providing employment opportunities within an acceptable walking and cycling distance of the significant majority of residential properties in the town. Some existing residents of Buntingford may wish to seek employment at the site, rather than travelling further afield (via car) to work. There are shopping facilities located at MFG Howegreen, within a reasonable walking distance from the site where future employees can undertake daily shopping needs before work, during breaks or after work. In addition, the consented residential development, when built, will provide a local centre, which will further bolster local retail opportunities accessible on foot from the site.

7.9.6 The FTP seeks to reduce single occupancy vehicle trips by 15%. In reality, that target will seek to reduce 15% of unsustainable single occupancy vehicle trips, considering that zero-emission vehicles are a sustainable mode of transport. A comprehensive list of measures are provided within the proposals, which will seek to promote and encourage active modes and sustainable modes of travel. That is further bolstered by the active modes and bus strategy provision delivered by the residential site when that is developed.

8.0 Additional Wider Benefits to Travel in Buntingford

8.1 Introduction

8.1.1 This section of my evidence sets out how the proposals not only benefit future users of the site, but also the existing residents of Buntingford and through trips.

8.2 Benefits to Travel in Buntingford

8.2.1 The proposed development will benefit road safety, active travel and public transport within Buntingford.

8.2.2 The overall traffic environment (i.e. including through trips) will benefit from the safety improvements arising from the speed limit reductions.

8.2.3 The proposed foot/cycle infrastructure along the A507 and Baldock Road, including the provision of the toucan crossing over the A10, improve safety and standard of provision for existing pedestrians and cyclists who use those routes. To the west of the A10, those improvements directly benefit any existing and future users of the Buntingford Business Park, as well as the BUNT3 District Plan allocation.

8.2.4 That therefore also serves existing and future (BUNT3) Business Park employees who use the public transport stops at Greenways east of the A10.

8.2.5 To the east of the A10, the improvements also benefit those employee journeys but also benefit residents and visitors of Buntingford walking or cycling along that corridor on say a trip to school or the town centre.

8.2.6 The proposals help deliver Local Authority stated aspirations too. To the east of the A10, Baldock Road is identified as both a primary and secondary walking route, and a primary cycle route within the East Herts LCWIP. To the west of the A10, the A507 is identified as a secondary cycle route. Provision of the footway / cycleways and a toucan crossing facility over the A10 provides better and safer continuity of the identified cycle network within the LCWIP between the east and west of the A10.

8.2.7 The proposals along Route 1 therefore serve and bring forward aspirations of the LCWIP, and this was a matter that was afforded positive weight within the Inspectors decision notice for the residential development (CD 7.1, Para 93). The provision of this infrastructure would also support a mode shift towards active travel for existing users.

8.2.8 In addition to the proposed road safety benefits and active travel infrastructure, the proposals will provide bus stops on the A507 west of the A10, which will benefit existing and future public transport users in that the need to cross the A10 on foot or by cycle will be reduced, and bus stops will be closer to their place of employment. Those new stops are a sustainable transport improvement which will provide a betterment to existing provision and encourage and promote public transport use for the Business Park and future development to the west of the A10.

8.2.9 The Appellant is also providing funding of £247k in line with the LHA Strand 2 Sustainable Travel Contribution request. This financial contribution will further enhance sustainable travel opportunities in Buntingford for existing and future residents, employees and visitors.

8.3 Summary

8.3.1 I consider that the proposals deliver additional benefits to the transport and travel environment in and around Buntingford. Those benefits go beyond just mitigating development impact and providing for the travel of development users.

8.3.2 The proposed speed limit reductions, toucan crossing of the A10, new footway / cycleway infrastructure and public transport infrastructure and Sustainable Travel Funding, all directly improve the existing travel environment in the area. Individually and in combination the proposed measures will improve road safety, provide new and upgraded pedestrian and cycle routes, bus stops and sustainable travel funding and so will better provide for active and bus travel for all users and will enable and promote a mode shift to sustainable travel for existing trip making in and around Buntingford.

8.3.3 By improving and providing pedestrian and cycle facilities along routes which are identified as primary and secondary in the LCWIP, the proposals serve to deliver those Local Authority aspirations.

8.3.4 As such, the wider sustainable travel and safety benefits of the proposed scheme, for existing and future residents, employees and visitors of Buntingford should be considered as a positive aspect of the proposals.

9.0 Policy Compliance

9.1 Introduction

9.1.1 This section of my evidence reviews the proposals against the NPPF, local and county wide policies. Particularly, my review focuses on the policy conflicts that are cited within the RfR1 and RfR3, (noting that the NPPF has been updated).

9.1.2 I again note that the LHA and LPA have dropped their case and the LPA have advised that their position having reviewed the proposals against policy is that the Appeal should be allowed.

9.2 Compliance with Policy

9.2.1 The cited policy conflicts in the RfR 1 and 3 include:

- RfR1 cites Policies TRA1, TRA2, ED1 and DPS2 from the East Herts District Plan (EHDP)
- RfR3 additionally cites Policies BUNT3, INT1 GBR2, DES2 from the EHDP.
- RfR 1 and 3 cite Policy BE2 and RfR3 cites Policy ES1 of the Buntingford Community Neighbourhood Plan (BCNP)
- RfR 1 cites Policy 1 and 5 of the Hertfordshire County Council Local Transport Plan 4 (HCC LTP4)
- RfR 1 cites Paragraphs 110 and 115 of the NPPF - (now superseded)

9.2.2 Policies DPS2, DES2 and GBR2 of the EHDP, and ES1 of the BCNP are cited within the RfR but are not transport policies.

9.2.3 Policy INT1 of the EDHP is also cited within the RfR, however, matters of attributing weight to the proposals are left to the planning experts and the Inspector.

9.2.4 Policy BUNT3 of the EDHP is cited within the RFR but no context is given as to how the Appeal site is in conflict from a transport perspective. In fact, the BUNT3 allocation is described as being in a sustainable location. My evidence has set out how the BUNT3 allocation benefits from the active travel and public transport interventions proposed as part of the Appeal site.

9.2.5 To comprehensively demonstrate how the proposals comply or conflict with the transport related policies cited in RfR1, RfR3 and in the new NPPF, I have tabulated those policies and cross referenced the various elements of the proposals against them. I present those tables as **PoE Appendix H** and summarise the key findings below.

Review of the Proposals against the 2026 NPPF

9.2.6 The decision notice cited policy conflicts with the NPPF Paragraphs 110 and 115 but those have been superseded. As such, my review of the proposals has been against the 2026 NPPF and has considered the relevant policies related to transportation, highways, site location sustainability and accessibility.

Policy S5, Paragraph 1 part J in Section 4 'Principle of development outside Settlements'

9.2.7 The overarching Policy S5 advises that various listed categories of development should be approved, unless adverse effects substantially outweigh benefits. S5 1(j), sets out that development outside of the Settlement to address an evidenced unmet need (employment)

should be physically well related to the existing Settlement and be of a scale which can be accommodated by existing or proposed infrastructure.

9.2.8 As my evidence has described, the site is opposite the recently approved residential development, which was determined to be physically well related to the Settlement of Buntingford by the Inspector in that Appeal. The employment site is closer to Buntingford. It is also adjacent to the BUNT3 allocation and Buntingford Business Park. Those and the residential development now also form part of the Settlement, as per the definition within the NPPF. The proposals enhance the connections to those consented developments and allocations, and further into Buntingford. The site is physically well related to the Settlement.

9.2.9 My considerations on how the proposals comply with Policy S5 are also described in Section 5.3 of my evidence and PoE Appendix H (Page 77 of my PoE Volume 2).

Plan Making Policy TR1 in Section 15 'Promoting Sustainable Development'

9.2.10 Policy TR1 is a Plan making policy, but I have reviewed it against the proposals nonetheless. I consider that the proposals comply with the criteria within Policy TRA1 in that the site is located sustainably, engagement with the LHA and LPA has been sought and maintained throughout the development of the proposals, the site will be suitably accessible on foot, by cycle and by public transport. My considerations against each criteria are described in greater detail in PoE Appendix H (Page 78/79 of my PoE Volume 2).

Decision Making Policy TR3 in Section 15 'Promoting Sustainable Development'

9.2.11 Policy TR3 is a decision making policy, and sets out the criteria in which development should follow inkling, suitably locating the site (reducing the need to travel, offering a genuine choice of travel mode), taking opportunities to support walking, cycling and public transport usage, ensuring no adverse effects on the highway network in terms of safety, capacity and congestion, and use of the DfT Connectivity Tool.

9.2.12 My evidence has demonstrated how the proposals comply with that criteria, and that is summarised within PoE Appendix H (Page 80/81 of my PoE Volume 2).

TR4: Street design, access and parking in Section 15 'Promoting Sustainable Development'

9.2.13 TR4 perhaps relates more to residential streets, but the principles have been maintained in the proposals. It is a Decision-Making Policy which relates to giving priority to pedestrians and cyclists both on-site and with neighbouring areas, allowing efficient delivery of access for goods vehicles and emergency service vehicles into the site, providing suitably parking provision and following the guidance of Manual for Streets.

9.2.14 My considerations are that the application is in outline, and the on-site layout is a reserved matter. It can be ensured at detailed design that the site suitably prioritises active modes, and those internal networks, and parking provision will be delivered in accordance with standards.

9.2.15 The proposals comply with the policy criteria of TR4, and my thoughts on those are set out within PoE Appendix H (Page 82 of my PoE Volume 2).

TR6: Assessing Transport Impacts in Section 15 'Promoting Sustainable Development'

9.2.16 Policy TR6 requires a Travel Plan and Transport Assessment to accompany the planning application, both of which have been included in the submission, along with numerous Technical Notes. It also relates to the assessment of traffic impacts, which are being dealt with in the Evidence of Mr Duffy, and how development should be refused if they would have a severe impact on the transport network.

9.2.17 The traffic impacts of the proposals are not points of contention in this Appeal. The planning submission has followed the requirements of Policy TR6. My thoughts on how the proposals comply with each criteria is presented in PoE Appendix H (Page 83 of my PoE Volume 2).

TR8: Public Rights of Way in Section 15 'Promoting Sustainable Development'

9.2.18 Policy TR8 of the NPPF relates to protecting, maintaining and enhancing the Public Right of Way Network.

9.2.19 No PRoWs are affected as part of the proposals for the Appeal Site. The proposals comply with the policy, as stated in PoE Appendix H (Page 84 of my PoE Volume 2).

DP3: Key Principles for Well Designed Places

9.2.20 Policy DP3 2d relates to the key principles of a well designed place, which states that development should provide transport infrastructure and choices which provide good connections to the wider Settlement and prioritise walking, wheeling, cycling and public transport. I consider that the proposals comply with the policy, in that they deliver a corridor of active travel improvements from the A507, across the A10 and into Buntingford, which was deemed by the inspector of the residential Appeal to be safe and suitable for all. No interventions arising from the proposals prioritise or encourage the unsustainable private car. The on-site layout will be designed to prioritise active modes, and public transport provision is provided on the northern frontage of the site. My summary of compliance is within PoE Appendix H (Page 85 of my PoE Volume 2).

CC2: Mitigation of Climate Change

9.2.21 Policy CC2 1a sets out that to enable sustainable patterns of movement are prioritised, and that walking, wheeling, cycling, and public transport are prioritised, the proposals should accord with Policies TR3 and TR4, which my evidence shows is the case. The proposals also will provide electric vehicle charging to support the transition to zero-emission vehicles, in accordance with that policy.

9.2.22 Policy CC2 1b outlines that the location of the development should limit the need to travel, improve catchment densities for local services and support local employment opportunities. My evidence throughout has demonstrated that the proposals accord with those principles.

9.2.23 A table setting out the areas of compliance is within PoE Appendix H (Page 86 of my PoE Volume 2).

Cited Policy Conflicts in the HCC LTP4

9.2.24 My review demonstrates how the proposals comply with Policy 1 and Policy 5 of the HCC LTP. Policy 1 relates to encouraging the use of sustainable modes, reducing the need to travel, providing for vulnerable road users and passenger transport needs. My evidence has set out a comprehensive list of sustainable transport interventions that prioritise walking, cycling and public transport usage. The primary route from the town to the site provides for pedestrians and cyclists, and provides controlled crossing facilities over the A10, increasing safety. The route has been reviewed by the Inspector in the residential development Inquiry who determined the route is safe and suitable. A reduced need to travel has also been demonstrated within my evidence.

9.2.25 Policy 5 relates how the county council will work with developers to ensure sustainable modes are prioritised and a reduced need to travel is provided, and that the site is safely and suitably accessible for all users both on-site and at its connections. It also relates to providing mitigations to reduce the impact of development, and requirements for a travel plan. My evidence has demonstrated compliance with those aspects of the policy.

9.2.26 Table setting out compliance with the above policies are within PoE Appendix H (Pages 87 - 89 of my PoE Volume 2).

Cited Policy Conflicts in the EHDP

9.2.27 From my review, I consider that the proposals comply with Policy TRA1 of the EHDP. This policy relates to achieving and promoting a sustainable development from a transport perspective through the location of the site, provision of sustainable transport infrastructure and ensuring the on-site layout prioritises active modes. My evidence has demonstrated how the site location is sustainable and physically well related to the Settlement, that a genuine choice of sustainable travel mode is provided and that the on-site layout will be designed to prioritise active modes and passenger transport at detailed design stage. The Inspector of the residential development Inquiry also found that those proposals accord with TRA1 (CD 7.1, Para 94)

9.2.28 Policy TRA2 of the EHDP relates to highway safety, traffic impact and the effect of the development on the character of the local environment. Matters of design and road safety are dealt with in the evidence of Mr Duffy.

9.2.29 Tables demonstrating how the proposals comply with those policies are presented in my PoE Volume 2 (Page 90-92).

9.2.30 Policy ED1 Paragraph ii of the EHDP relates to the location of employment sites, and where access can be achieved by a choice of sustainable transport modes. My evidence has demonstrated compliance with this policy, in that the site is suitably located and that the site is accessible on foot, by bicycle, by public transport and by sustainable vehicle trips. A table demonstrating how the proposals comply is presented in my PoE Volume 2 (Page 97).

9.2.31 The tables of policy compliance in PoE Appendix H also set out my comments on policies INT1, GBR2, BUNT3, DES2 and DPS2, even though those are not applicable to or of material relevance to transport and highways matters.

Cited Policy Conflicts in the BNCP

9.2.32 Policy ES1 is included within the tables in PoE Vol 2 Appendix H but is not related to transport.

9.2.33 Policy BE2 of the BCNP relates to the upgrade of Buntingford Business Park or the provision of new Employment sites. Whilst not directly related to transport, the policy states that increased provision of employment opportunities will enable residents to have access to local jobs that are accessible by sustainable modes of transport, and reduces the need for commuting to London or elsewhere. My evidence has described how the proposals are suitably accessible by sustainable modes, well connected and offer a reduced need to travel outside of Buntingford for employment, as such reducing reliance on the private car for work. This is tabulated in my PoE Volume 2 (Page 99)

9.3 Summary

9.3.1 In summarising my policy review, I consider that the proposals comply with the requirements of local, county wide and national policy in relation to highways, transportation, accessibility and sustainability aspects.

9.3.2 The proposals positively deliver the requirements of those policies, offering safe and suitable access for all users and promoting sustainable travel.

9.3.3 As of mid October, the LPA and the LHA have dropped their case, which is a clear indication that the proposals are not in conflict with local or national policy.

10.0 Summary and Conclusions

10.1 Overview

10.1.1 I am content for this Summary to be read as my Summary Proof of Evidence.

10.1.2 My Proof of Evidence relates to the transport related aspects of accessibility and sustainability of the proposals. The Inspector included the site location as one of the Main Issues in the Case Management Conference, and so my evidence also describes the key site locational characteristics from a transport perspective.

10.1.3 As of Mid-October 2026, the LHA and the LPA have dropped their case and consider that the proposals should be approved At the time of finalising this Proof, a Statement of Common Ground (SoCG) which includes the Authorities position on Highways is in final draft stage, but has not yet been signed. It is hoped that the SoCG will be a Core Document before this Inquiry. The Authorities have not entered into a Highways Statement of Common Ground, but did so on the recent residential Appeal Ref: 6008238 on an adjacent site to the north of the A507. I refer to points agreed for that Appeal where I consider they are also directly relevant to the employment Appeal.

10.1.4 In deciding that residential Appeal, the Inspector determined the following points which are of particular relevance to this employment Appeal:

- The residential site benefits from a good baseline level of connectivity, with the existing services and facilities within Buntingford located within an acceptable walk and cycle distance. The inspector confirmed that a 2km walk distance is suitable to encourage journeys on foot.
- The proposed active travel and public transport improvements would enhance that baseline level of connectivity, providing safe and convenient active travel links which include the route along the A507 / Baldock Road (and the toucan crossing).
- Good on-site connections could be secured through the detailed design process.
- Individual routes did not need to provide a perfect solution, and that LTN 1/20 allows a degree of flexibility in design and provision.
- The proposed pedestrian / cycle route along the A507 and Baldock Road, including the proposed Toucan Crossing, is safe and suitable.
- The existing and proposed bus infrastructure and services would provide residents with a realistic and convenient choice of travel mode to Buntingford and wider towns.
- The site is suitably and sustainably located, physically well related to the Settlement, and offers a genuine choice of travel modes which provide opportunities to reduce car journeys.

10.1.5 Even with the current Authority position, the Inquiry will still be heard by the Inspector, so I have presented my evidence relating to the topics of accessibility and sustainability from a highways and transportation perspective. Those areas assist in informing the Inspectors main

points of location in relation to policies and the Authorities previous points on sustainable travel, active travel and isolation.

10.1.6 Whilst my evidence addresses those points on their own merits, I also cross reference relevant points to which the LHA were in agreement for the residential Appeal and also relevant points which were established by the Inspector at that Appeal Inquiry.

10.1.7 It is notable that in the last two LHA consultation responses, the only points of objection which were raised related to highway safety. None of points within the LHAs latest consultation responses refer to the locational and sustainable travel aspects or wider active travel aspects as appear in the RfR1 and RfR 3.

10.1.8 Matters of Highway safety are being dealt with for the appellant by Mr James Duffy, but for ease of cross reference those same points were determined in favour of the Appellant at the residential Inquiry by the Inspector CD 7.1 paragraphs 46, 50, 53, 56 and 58.

10.2 Locational Matters, Connectivity

10.2.1 In analysing this employment case, I have reviewed the connectivity of the site using the DfT's Connectivity Tool, which by definition "*generates a national measure of connectivity for any location in England and Wales. The connectivity score measures people's ability to get where they want to go.*"

10.2.2 My review found that the Appeal site at present, has a connectivity score of 48 for all modes except driving. Applying guidance from the DfT, this means that the site is 48% as connected as the most connected area of England and Wales (Tower Hamlets in Central London). A more localised comparison of the Appeal site against other areas within East Hertfordshire shows that the site is categorised as Band B in a 10-tier banding scale from A to J (with A being the most connected), i.e. the Appeal site is located within the second highest banding of connectivity in the district. The north-east corner of the site is in fact partially within Band A.

10.2.3 The site also has a connectivity score of 76 by driving which demonstrates the excellent connectivity by road which the site benefits from. That assists sustainable car journeys, taxis, public transport, deliveries and emergency services.

10.2.4 Those scores will be further enhanced under the proposals. The Connectivity Score of this Appeal site (48) is greater than the Connectivity Score of the residential Appeal site (45).

10.3 Locational Matters, Physically Well Related to the Settlement

10.3.1 My evidence describes how the Appeal Site is physically well related to the Settlement, consistent with the requirements of the NPPF Policy S5 for developments outside of the Settlement. The glossary of the NPPF defines a Settlement to include allocations and consented developments that will form part of the Settlement once developed – and that therefore encompasses the recently approved residential development, the BUNT3 allocation and Buntingford Business Park. Which are adjacent to the employment proposals.

10.3.2 The Inspector of the residential development Appeal determined that it was physically well related to the Settlement, and that the location of the development would limit the need to

travel by private car, and that it would offer a genuine choice of sustainable, quality and safe transport modes for residents and users. Those conclusions can also be drawn for the Appeal site, which is in fact closer to the existing Settlement than the residential site.

10.4 Safe and Suitable Access

10.4.1 Matters of highway safety are dealt with in the evidence of Mr Duffy. The same highways safety points raised by the Authorities were determined by the Inspector of the residential Appeal to be acceptable and are no longer contested by the Authorities.

10.4.2 With regards to physical access for the proposals, it can be ensured at detailed planning stage that the on-site layout will be designed and laid out to modern standards, putting pedestrians and cyclists to the fore.

10.4.3 The Appeal site will be served by an all-modes roundabout access of the A507, with an additional active travel access further east off the A507, tying into proposed footway/cycle infrastructure. These accesses ensure convenient, safe and suitable access into the site for all users and that the site is suitably connected with the off-site network.

10.4.4 Off-site, the proposals include a new 4m wide shared foot/cycleway on the A507. A parallel crossing will connect the proposed active travel routes on the northern and southern side of the carriageway.

10.4.5 A proposed Toucan crossing facilitates safe crossing of the A10 and connects to a 3m shared footway /cycleway on Baldock Road east of the A10. The proposals promote a traffic speed reduced and street lit environment along that route. The proposals offer the same route improvements which were approved as part of the residential development, (other than additionally serving the southern of the side of the A507, rather than the north). The Inspector from that Appeal found the route to be safe, suitable and accessible for all users, including the proposed toucan crossing facility across the A10.

10.4.6 Almost all residential areas of Buntingford and the Town centre are accessible within an acceptable walk distance.

10.4.7 Although the proposals do not rely upon the residential development coming forwards, the employment development will be bolstered by three additional access routes through the residential site and over the A10 via improved and new bridge crossings and PRoW upgrades when that development does come forward. Those routes were also found to be safe and suitable by the Inspector at the residential Appeal.

10.4.8 I consider that the proposals offer safe and suitable access for all users, on site, at the interface between the site and external network and on onward routes to residential and town centre areas.

10.5 Sustainable Travel and Accessibility

10.5.1 The topic of sustainability of the site is broader than just travel alone, with transport forming only one part of the social, economic and environmental considerations of sustainable development. My evidence seeks to address the transport aspects.

10.5.2 The proposals will benefit from digital connectivity, which will support home and flexible working, whilst also reducing the need to access services in person, thereby helping to reduce travel demand and peak-period traffic.

10.5.3 Off site, the employment proposals provide sustainable travel choices for active modes through the footway/cycleway infrastructure proposals along the A507 and Baldock Road (Route 1) which are also committed under the recent residential approval.

10.5.4 The employment proposals also promote sustainable travel choice by public transport by providing new stops along the site frontage. Those (and the Toucan crossing) will also encourage public transport use by existing and future users of Buntingford Business Park and the BUNT3 allocation. Bus services 18, 36, 37, 37x and 331 all use the existing bus stops on Baldock Road, opposite Greenways to the east of the A10 and are within a reasonable walking distance.

10.5.5 In addition to those physical works, the Appellant has agreed to provide a financial contribution of £247k, as requested by the LHA and calculated using HCCs Toolkit, as part of HCCs Strand 2 Sustainable Travel contribution

10.5.6 Sustainable travel is also promoted as the development reduces travel distance and the need to travel by car, by providing employment opportunities within an acceptable walking and cycling distance of the significant majority of residential properties in the town. Some existing residents of Buntingford may wish to seek employment at the site, rather than travelling further afield (via car) to work.

10.5.7 There are shopping facilities located at MFG Howegreen, within a reasonable walking distance from the site where future employees can undertake daily shopping needs before work, during breaks or after work. In addition, the consented residential development, when built, will provide a local centre, which will further bolster local retail opportunities accessible on foot from the site.

10.5.8 The FTP seeks to reduce single occupancy vehicle trips by 15%. In reality, that target will seek to reduce 15% of unsustainable single occupancy vehicle trips, noting that zero-emission vehicles are a sustainable mode of transport. A comprehensive list of measures are provided within the proposals, which will seek to promote and encourage active modes and sustainable modes of travel. That is further bolstered by the active mitigations and bus strategy provision which will be delivered by the residential site when that is developed.

10.5.9 I consider that the proposals are acceptable in terms of sustainable travel.

10.5.10 The definition of accessibility in the HCC Local Transport Plan 4 recognises the role of the private car. It is clear that whilst prioritisation of active and public transport is prioritised by the proposals (as advised by planning policies), a level of reliance upon the private car for some users, is to be accepted and the site is well connected in that regard.

10.5.11 Not all vehicle use should be regarded as unsustainable. The development will support sustainable travel by accommodating charging facilities for zero-emission vehicles and promoting car sharing, both of which are recognised as sustainable forms of transport. Over time, the use of unsustainable vehicles (internal combustion engine vehicles) will be phased

out, and after 2030 the purchase of new ICE vehicles will be restricted. Over the lifespan of the development, the ICE car will be a quickly diminishing mode of travel.

10.5.12 It is was agreed by all parties at the residential Appeal that services and facilities within Buntingford are accessible within a 2km walking distance of that site. The employment site is closer to the centre of Buntingford and my review has identified that the majority of residential areas within Buntingford are within that catchment, via the primary walking and cycling route along the A507 and Baldock Road. The whole of Buntingford will be accessible within a 5km cycle catchment.

10.5.13 When the recently approved residential development is delivered, it will additionally provide three active travel routes into Buntingford, local facilities and enhanced public transport services, all of which would benefit the sustainable accessibility of the Appeal site.

10.5.14 I consider that the employment proposals are suitably accessible on foot and by cycle via the proposals along Route 1, and that further committed routes will be available once the residential site has been developed.

10.5.15 I also consider that the existing level of bus provision is acceptable to serve the site, and that will be enhanced by the provision of the proposed bus stops on the A507, and further enhanced by the agreed bus strategies of the consented residential sites. Residents of Buntingford, Hertford, Stevenage, Letchworth, Royston amongst other centres of population will have public transport access to the site. Accessibility of the site via public transport has not been raised as a concern in the LHAs latest two consultation responses, and the LHA did not raise concerns on the level of existing public transport provision in relation to the recently approved employment application ref: 3/25/1986/FUL which is opposite the current employment site.

10.5.16 I consider that the proposals are acceptable in terms of access and sustainable accessibility

10.6 Wider Benefits to Travel in Buntingford

10.6.1 I consider that the proposals deliver additional benefits to the transport and travel environment in and around Buntingford. Those benefits go beyond just mitigating development impact and providing for the travel of development users.

10.6.2 The active travel route along the A507, the A10 Toucan crossing and the active travel route along Baldock road all serve aspirations of the East Herts LCWIP and can better serve existing active travel and public transport trip making to the Buntingford Business Park area.

10.6.3 Individually and in combination the proposed speed limit reductions, Toucan crossing, active travel infrastructure and public transport infrastructure and sustainable travel funding, will all improve the existing travel environment in the area. That will improve road safety, provide access suitable for those with mobility needs and encourage a mode shift to sustainable travel for existing trip making in and around Buntingford.

10.6.4 As such, the wider sustainable travel and safety benefits of the proposed scheme, for existing and future residents, employees and visitors of Buntingford should be considered as a positive aspect of the proposals.

10.6.5 To reinforce my findings on matters of location, access and sustainable accessibility the Inspector on the adjacent residential Appeal site found that site to be suitably and sustainably located, physically well related to the Settlement, and offered a genuine choice of travel modes which provide opportunities to reduce car journeys. The Inspector also concluded that some of the proposals, including infrastructure and services, would benefit existing residents of Buntingford and bring forward some aspirations of the Authorities Local Cycle and Walking Infrastructure Plan and Rights of Way improvement plan (LCWIP and RoWIP).

10.6.6 In transport terms, the proposals are situated in an accessible and sustainable location, and the site is physically well related to the Settlement. The increasing prevalence of sustainable vehicles, modern active travel infrastructure, bus accessibility, and promotion of sustainable travel within the Travel Plan, all align with vision-led aspirations for a sustainable and accessible development.

10.7 Policy Compliance

10.7.1 I have reviewed the proposals against all the transport related policies referred to in the Reasons for Refusal and in the New NPPF. Policies and compliances are tabulated in Appendix H and set out, point by point in Section 9. Not all the policies cited in the RFR are applicable to highways and transport sustainability and accessibility matters.

10.7.2 Further to my review I consider that the proposals comply with NPPF policies S5 1j, TR1, TR3, TR4, TR6, TR8, DP3 and CC2. The proposals comply with EHDP policies TRA1, TRA2 and ED1 , with LTP policies 1 and 5 and with the BCNP policy BE2.

10.7.3 As of mid October, the LPA and the LHA consider that the proposals should be approved, which is a clear indication that the proposals are not in conflict with local or national policy.

10.8 Conclusions

10.8.1 In consideration of my evidence, I conclude that;

- The site is physically well related to the Settlement, is sustainable (from a transport perspective), is well connected and is accessible;
- The site is adjacent to other sites which are agreed to be in sustainable locations;
- The jobs created close to Buntingford and close to the recently approved Residential site will reduce the need for out commuting to employment further afield, for some residents;
- The site benefits from a good baseline of connectivity, which will be enhanced further through the proposals;
- The proposals provide safe and suitable access for all modes of travel;
- The proposals prioritise, encourage and provide for sustainable journeys on foot, by cycle, by bus travel and by sustainable vehicles;
- Bus, highway, cycle and pedestrian improvements and contributions have been developed in conjunction with the authorities and are appropriate;
- The improvements deliver aspirations of the LCWIP;
- Site users will have a choice of travel modes and will not be reliant upon the private car;

- The proposals comply with national and local policy;
- The proposals offer a safe active travel connection between the site and Buntingford which will also benefit existing trip making and encourage active travel; and
- The Inspectors decision for the recently allowed residential approval, to the north of the A507, addresses substantially the same points and supports the above findings.

10.8.2 I conclude that the development proposals should be considered to be acceptable in terms of travel and transport related accessibility and sustainability and that the proposals are physically well related to the Settlement.