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

Director of Planning

North Hertfordshire Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

District ref: 25/02333/PNR
HCC ref: NH/26578/2025
HCC received: 30 October 2025
Area manager: Manjinder Sehmi
Case officer: Paul Marshall

Location

Lilley Hoo Farm, Lilleyhoo Lane, Lilley, Luton, LU2 8NQ

Application type

Prior Approval

Proposal

ADDITIONAL INFORMATION

Prior Approval Class R Agric to Flex Use : Change of use of an agricultural building to a flexible use within Class B8 (Storage or Distribution).

Recommendation

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

There is insufficient information supplied with this application to enable the Highway Authority to reach a recommendation. In the absence of the necessary information, the Highway Authority recommends refusal due to doubt over possible implications for highway safety and convenience. Please see reason for refusal below:

While the TRICS assessment indicates a low level of trip generation, including HGV movements, the Highway Authority must consider not only statistical likelihood but also the operational and safety implications of potential vehicle conflicts on a narrow rural lane with limited forward visibility. The applicant's analysis assumes ideal conditions and does not fully address the risks posed by the geometry of Lilley Hoo Lane, particularly the two sharp bends previously highlighted.

To mitigate these risks, the inclusion of a third passing bay, as proposed in the October 2025 Technical Note, is considered necessary and proportionate. This measure aligns with Hertfordshire's

Place & Movement Planning Design Guidance (Part 3, Chapter 8), which emphasizes the need for passing opportunities on single-track roads carrying HGV traffic to avoid reversing and maintain safe operation. The Highway Authority is satisfied that the third passing bay will provide adequate space and visibility for heavy goods vehicles (HGVs) to pass safely without reversing. Positioned between the two bends, it will maintain forward visibility and reduce potential conflict points. In line with the guidance, the bay should be constructed to accommodate HGV dimensions, typically requiring a length of 15–20 metres and a widened carriageway of approximately 6.0–6.5 metres to allow two HGVs to pass without encroaching on verges.

The land immediately behind the proposed passing bays rises substantially above the existing carriageway level, forming an embankment. This topographical constraint means that retaining structures will be likely be required to support the widened sections and prevent slope failure. Without these measures, there is a risk of embankment collapse, which could compromise both the highway and adjacent land.

CONCLUSION

The applicant should provide:

Cross-sectional or 3D plans showing how the widened carriageway and passing bays will interface with the embankment.

Details of retaining wall type, height, and foundation design, nor drainage provisions to manage surface and groundwater.

Dimensions of the passing bays and existing carriageway width, which are essential to confirm compliance with design standards.

CONCLUSION

The Highway Authority recognises the applicant's efforts to address previous concerns and agrees in principle with the proposed passing bays and swept path analysis. However, the application cannot be approved until further information has been provided. This must include detailed dimensions for the passing bays and carriageway width, as well as cross-sectional or 3D plans showing retaining structures to ensure long-term stability and compliance with Hertfordshire's Place & Movement Planning Design Guidance. The Highway Authority are unable to extend the grant of planning permission until the information discussed above has been provided.

Signed

Paul Marshall

13 November 2025