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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: 25/01766/OP
HCC ref: NH/25803/2025
HCC received: 22 July 2025
Area manager: Manjinder Sehmi
Case officer: Samuel Tearle

Location

Land On The South Side Of, Cowards Lane, Codicote, Hertfordshire,

Application type

Outline

Proposal

Outline Application : Outline application with means of access for residential development of up to 30 dwellings (including affordable housing); following demolition of all existing structures; associated landscaping, drainage, car parking; infrastructure and all ancillary and enabling works (all matters reserved except means of access)

Recommendation

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused due to insufficient information as set out under sub-section Design Considerations.

COMMENTS:

Description of Proposal and Pre-Application Advice

This outline application is for the construction of up to 30 residential dwellings with associated landscaping and infrastructure all matters reserved except for means of access on land south of Cowards Lane, Codicote, Hertfordshire.

A concept masterplan has been submitted with the planning application and comprise the following principles:

- Up to 30 dwellings including 50% affordable housing;
- A range of house types, sizes and tenures;

- Vehicular and pedestrian access from Cowards Lane; and
- Open space for public amenity.

A Planning Statement submitted with the planning application (report reference: 333102254/A5 dated July 2025) states that pre-application advice has been sought for the incorporation of the Public Right of Way (PRoW) into the application, which was agreed with the PRoW Officer. No record of the pre-application engagement has been included with the application.

A Transport Statement (Document Ref: 2025/8549/TA01, dated July 2025) has been produced by RGP Transport Planning Consultants to support the planning application.

Site Description and Local Plan Allocation

The Site is located on Cowards Lane in Codicote, approximately 2.5km north-west of Welwyn Garden City, and is occupied largely by green space. The site and its surrounding area is rural in nature, with Cowards Lane being subject to a 20mph speed limit and is narrow in places with indiscriminate footway provision along its length.

Located on the north-east and north-western boundary of the site is residential dwellings whilst the remaining boundaries of the site are surrounding by green fields.

The site is located within the adopted North Hertfordshire Local Plan (2011 – 2031) as Green Belt under Policy SP5.

Site History

There is no recent associated planning history with this site, with the most recent planning application submitted for development at this site in April 1989 for an outline planning application for the erection of nine detached dwellings and six cottages under application ref: 89/00504/1. The application was refused June 1989.

Surrounding the site, there has been the following planning application:

- 23/02895/OP – Land on the northeast side of The Close, Codicote: Outline planning application for the erection of up to 42 residential dwellings, including affordable housing, public open space, landscape planting, sustainable drainage system and new access arrangements from The Close (all matters reserved except means of access). The application was submitted in December 2023; however, remains undetermined.

In addition, several planning applications have been submitted nearby, and most recently includes:

- 23/00743/RM – Land adjacent to Oaklea and South of Cowards Lane, Codicote: Reserved matters application for the approval of the details of the appearance, landscaping, layout and scale of the development for 80 dwellings including streets, car parking, open space and associated works (pursuant to Outline Application 17/01464/1. The planning application was granted permission in June 2024 and is currently under construction.
- 19/01448/FP – Former Wyevale Codicote Garden Centre, High Street, Codicote: Residential development of 66 dwellings and associated new local open space, access and associated works. The planning application was granted permission in January 2023.

Traffic Impact

Trip Rates

The trip generation for the proposed residential development has been estimated using 'per dwelling' trip rates from the TRICS database, which have been taken from a nearby development at Heath Lane, Codicote (planning app ref: 18/02722/FP) that was refused and subsequently granted

approval at Appeal in March 2021. HCC note that an updated TRICS assessment has been carried out using the same selection criteria and the resultant trip rates are lower than the approved trip rates. HCC highways observe the difference in trip rates for the proposed development and note that the proposed development is anticipated to generate a total of 18 two-way movements in the AM peak and 17 two-way movements in the PM.

Junction Capacity

The submitted Transport Statement includes a junction capacity assessment of the Cowards Lane/B656 priority junction using information found within a Transport Assessment submitted for planning application reference 17/01464/1 for up to 83 residential dwellings. The AM baseline + development scenario has been assessed.

HCC Highways note that the results of the proposed development demonstrate that the proposed impact at the junction is minor based on the RFC output; however, HCC have no further information to review the PM peak results or the outputs of the junction results to understand what data has been included in the junction capacity assessment, which should be provided for consistency.

HCC highways reiterate that new residential development should proactively promote active travel and sustainable modes of travel to/from residential development as the primary mode of travel - following a Vision led approach as per the NPPF. It should be noted that all developments that increase the pressure on existing sustainable travel networks are required to provide S106 Sustainable Transport Contributions to mitigate the impact of the proposed development.

Distribution and Impact of the Development Traffic

The submitted Transport Statement predicts that development traffic will be split 50/50 between journeys from/to the east using Cowards Lane and from/to the west via St Albans Road, which would result in a maximum of nine additional vehicle movements in each direction on Cowards Lane during the conventional peak hours.

However, there is no evidence provided as to how or why the predicted 50/50 split of development traffic has been forecast. Assumptions applied to the distribution of traffic should be evidenced within the Transport Statement.

Design Considerations

Pedestrian Access

To promote journeys on foot, the development proposals include the introduction of a 2.0m wide footway along the western side of the proposed access, which will continue along the southern side of Coward's Lane towards St Albans Road and the proposed footway will provide dropped kerbs and tactile paving to link the site to the existing footway on St Albans Road. The proposed 2.0m wide footway appears to be contained within the Applicants red line boundary or on the adopted highway, as shown on the Proposed Access Arrangement plan (Drawing No: CLC-RGP-XX-XX-DR-T-001 Rev P06).

However, HCC note that the drawing appears to be contained on OS mapping and not topographical mapping, therefore, it is uncertain whether the footway can be delivered fully within the applicants land or on the adopted highway. It is recommended that the full length of the proposed footway is plotted on topographical mapping as it is vital that HCC are provided with comfort that this footway is achievable to ensure that the proposed development complies with Policy 1: Transport User Hierarchy in the adopted Local Transport Plan.

Detailed crossover designs of the footway will interact with the private drives along the Coward's Lane must be submitted in order to demonstrate the design is deliverable.

An existing PRow (footpath number 23) travels through the centre of the site, which is to be incorporated into the site. The Transport Statement states that a meeting was held with the local Access Projects Officer from HCC's Countryside and Rights of Way team on 16th June 2025, where a number of key points were discussed, as follows:

- The PRow would maintain a 2.0m width and 1.0m buffer (except for where the roadway immediately abuts it, since this acts as a buffer from vegetation). The alignment would not be subject to alteration, which is welcomed.
- A new footway link along Cowards Lane will enhance connections to the PRow and removing the two sets of gates at the northern end of the site represents a further improvement.
- A sealed hard surface would be provided for the initial part of the PRow alongside the access road, with this changing to unsealed permeable surface at an appropriate location within the site.
- At any points where the PRow crosses internal estate road, priority should be given to pedestrians. It was recommended this would take the form of raised table crossings.
- The rights of way team have no specific lighting requirements.

The Highway Authority are satisfied with this arrangement as the footway and PRow would allow pedestrians living at the site to make journeys on foot safely to St Albans Road whilst members of the general public using the PRow will be afforded a betterment when using footpath number 23. This is subject to confirmation that the proposed footway can be delivered within the Applicants land or on the adopted highway.

Vehicle Access

The Transport Statement states that the site is to be served by one single vehicular access point from Cowards Lane. The access is existing and is a shared point of access also used by residential properties both left and right of the access point. The access and junction will be upgraded to accommodate the proposed development through provision of a 5.5m wide access with a 2.0m wide footway on the western side of the access road that will run through the site and provide a continuous footway link to the existing footway on St Albans Road. Access to the existing properties either side of the entrance will continue to be provided either through the retainment of the existing access or through provision of a vehicle crossover.

A Proposed Access Arrangement plan contained in the Transport Statement (Drawing No: CLC-RGP-XX-XX-DR-T-001 Rev P06) outlines the proposed access arrangements to serve the proposed development and for access to the existing residential properties that already use the access. The plan has plotted the required visibility splays for the speed of the road (20mph), which are 2.4m x 25m in both directions, as well as forward visibility of 25m for a vehicle waiting to turn right into the site. HCC highways note that the proposed site access has been designed on OS mapping and not topographical mapping, which should be provided to ensure that the proposals can be delivered and not impact the surrounding street furniture and infrastructure, as noted on the submitted Proposed Access Arrangement plan.

A swept path analysis of two standard cars (4.572m in length and 1.769m wide) passing at the site access is provided on the plan (Drawing No: CLC-RGP-XX-XX-DR-T-001 Rev P06) which is accepted; however, the plan should also show two larger cars at the site access as it is unclear from the information provided as to whether the radii of the proposed site access is suitable. It should be noted that the access should be designed in accordance with HCC's Highways Place & Movement Planning and Design Guide (adopted March 2024), which is currently unclear based on the information contained in the submitted Transport Statement and corresponding plans.

In addition, it is unknown whether the vehicle crossover outlined on the plan to be provided for the adjacent dwelling (known as Marlin) is suitable for access in or out of the dwelling. A swept path

analysis of a vehicle accessing the dwelling should be provided to ensure that the crossover is appropriate and meets with Dropped Kerb Guidance contained in the Place & Movement Planning and Design Guide (adopted March 2024).

Personal Injury Collision Data

The Transport Statement includes analysis of personal injury collision data for the most recently available five-year period (October 2019 to October 2024) along Cowards Lane, which has been obtained from HCC. A plan submitted within the statement demonstrates that just one collision has been recorded during that time, which was minor in severity and occurred at night due to an animal hazard in the carriageway.

Road Safety Audit

A Stage 1 Road Safety Audit (RSA) has been submitted with the Transport Statement, which has been carried out by The Safety Forum Limited between 20th and 23rd June 2025.

The RSA does not identify any safety issues for the proposed site access; however, does identify the requirement for a further pedestrian crossing point over St Albans Road. Whilst no Designers Response is included within the Transport Statement, the recommendation has been incorporated into the proposals.

Cycle and Car Parking

The proposals include the installation of seven car parking spaces located to the rear of the development and provision for up to 20 cycle parking spaces located on the ground floor within the footprint of the building, which appear to provide 18 spaces for residents and one cycle space for each of the commercial units based on the Proposed Ground Floor Plan (Drawing No. PAD388 – P73 Rev -, dated March 2025).

Cycle Parking

HCC note that the Applicant intends to provide cycle parking, as detailed within the 'Vehicle Parking at New Development Supplementary Planning Document', which stipulates that one secure covered space should be provided per dwelling although none are required if a garage or a secure area is provided within the curtilage of the dwelling.

The Transport Statement states that each dwelling within be afforded a private store within its curtilage in accordance with standards. HCC note this statement and would expect to see further details on the private store in a full planning application.

Car Parking

The Transport Statement notes that whilst the application is in outline, the North Herts Council standards will be applied to the site, which is a minimum of one space per dwelling for one bed dwellings and a minimum of two parking spaces for two or more bed dwellings. In addition, Electric Vehicle charging points will be provided for each dwelling and visitor/unallocated parking will be provided within the site, in line with North Herts Council standards.

Whilst car parking is for the Local Highway Authority to provide comments, HCC Highways note that the standards are minimum standards and sufficient parking spaces for each property should be provided to ensure that erroneous parking does not occur within the site or on the adjacent highway.

Refuse Collection

The Transport Statement includes a swept path analysis of a refuse vehicle (Drawing No. CLC-RGP-XX-XX-DR-T-003 Rev P03) accessing and egressing the proposed site access, which appear suitable.

HCC highways request that the submission of a full planning application also includes a plan of the refuse vehicle serving the site to ensure that the proposed development can comfortably accommodate the refuse vehicle and ensure that bins are located within acceptable drag distances.

Travel Plan Statement

A Travel Plan Statement (Document ref: 2025/8549/TP01 Rev B dated July 2025) has been prepared and submitted with the planning application to support the proposed development. The report outlines a 2km catchment area from the site and encompasses local retail units and leisure facilities including nearby bus stops located on B656 High Street, within a 400m walk from the proposed site access.

The Statement utilises a baseline mode split taken from the accompanying Transport Statement (at 4.1.1) expected when the site is operational, as follows:

- Vehicles – 77%.
- Public Transport – 3%.
- Walk – 18%.
- Cycling – 2%.

The It is unclear from the Travel Plan Statement (and Transport Statement) where this anticipated baseline is derived from in order to inform targets to reduce the number of single car occupancy trips to and from the proposed development or targets to increase active travel and sustainable modes of transport. Baseline data and targets should be set by local travel conditions and be reflective and relevant to the surrounding area to ensure that future targets set are achievable and realistic.

HCC highways note that there is no commitment to promote the Travel Plan during construction of the development/marketing of the site to influence residents travel behaviour before they move to the site. It is vital that residents are aware of this as early as possible before moving to site to achieve a mode shift in travel behaviours.

Conclusion

The information submitted has not satisfied the Highway Authority and it is recommended that the proposal is refused due to concerns regarding whether the proposed footway can be delivered to promote walking and cycling trips from the site, contrary to HCC Local Transport Plan Policies 1 and 5.

Once additional details requested in the response are provided, and found to be satisfactory, then the Highway Authority will be in a position to raise no objection.

Signed

Samuel Tearle

14 August 2025