



DW TRANSPORTATION
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Development Management
North Hertfordshire Council
Council Offices
Gernoon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

FAO Alex Howard MRTPI

26 November 2025

Dear Mr Howard

Our Ref: DWT368

RE: APPLICATION REF NH/25598/2025 Whitehorse Service Station, Clothall Road, Baldock

The response is written by DW Transportation Limited, on behalf of J P & S Servicess Ltd, in response to Hertfordshire County Council's response as local highway authority (LHA) to planning application ref 25/01514/FP as issued to North Hertfordshire Council 9 November 2025 (HCC ref NH/25598/2025). The purpose of this response is to demonstrate that each of the LHA's concerns have been addressed by providing appropriate justification.

This note is structured with the same section headings as the LHA response for ease of cross-referencing.

Vehicle Tracking

The LHA has indicated that the tracking for 'standard' vehicles and larger delivery vans (e.g. Luton vans) remains insufficient citing that multiple manoeuvres to exit would raise operation concerns.

Whilst the comments on site operation are appreciated and welcome, this is not the remit of the LHA unless such operations affect the safety of users of the public highway. In the case of on-site manoeuvring, at worst, this may result in an occasional minor inconvenience depending on how site users decide to position their vehicle for fueling. On-site tracking is not considered to have any material impact on the local highway network and in accordance with the NPPF, certainly would not result in a cumulative or severe impact.

Notwithstanding this, additional tracking has been undertaken using a 'standard car' and Luton van. As requested by the LHA, all tracking has been shown on enclosed separate drawings, Drawings TS02 – TS04, to allow a greater level of scrutiny and detailed assessment. The tracking demonstrates the following:

- All bays are accessible by cars;
- All bays are accessible by a Luton van; and
- The two bays at the front of the store are accessible with the pumps nearest the store in use.

As with many PFSs across the UK, not all bays will be accessible by a Luton van-size vehicle at all times. There will be times when only the bays nearest the highway will be accessible. Any driver of a large vehicle, such as a Luton van, will assess the situation on entering the site and use the most accessible bay.

Whilst the LHA is welcome to scrutinise the on-site tracking, we would re-emphasise that any on-site manoeuvring should not be the concern of the LHA, unless it has a direct impact on public highway safety, and any issues during operation would be dealt with by the applicant as an experienced PFS site operator.

Parking Layout and Access

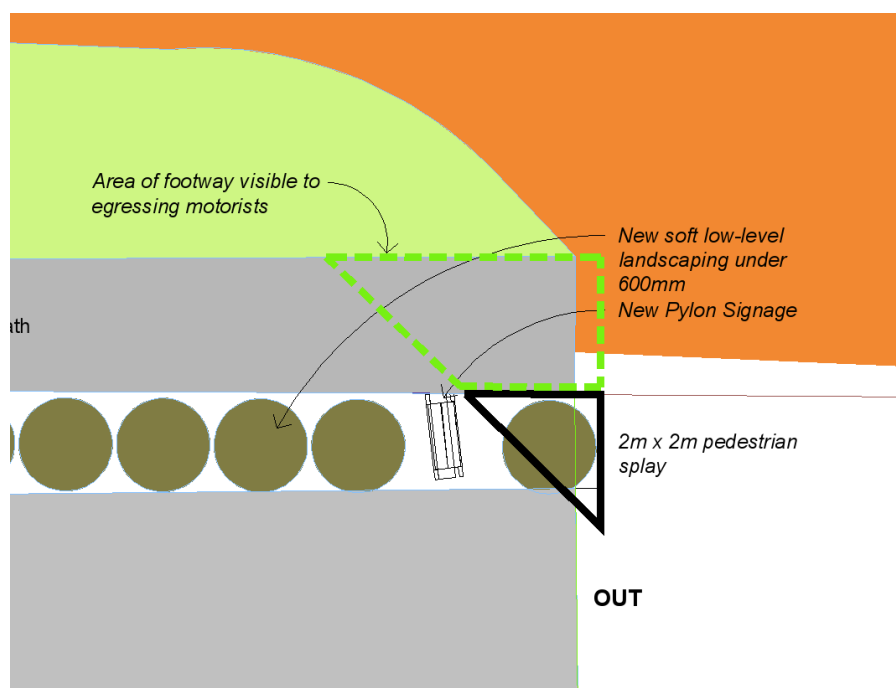
The LHA considers the disabled bay to be too far from the shop entrance.

There is no prescribed travel distance within AD Part M of the Building Regulations for the disabled parking bays from the main entrance to a commercial unit. Accessible gradients and convenient access are stated within the building regs, both of which are met. BS8300-1 provides guidance distances within 50m; the proposed layout achieves 10-15m and is therefore the position of the accessible bay should be considered acceptable. As stated previously on other matters above, the position of the disabled bay is an on-site issue which would be suitably managed by the site operator. The position of the accessible bay has no impact on the public highway network. Finally, should any disabled person require assistance anywhere on the site, shop assistants would be available to offer this without hesitation.

The LHA has stated that vegetation and the proposed totem sign restricts pedestrian visibility.

To confirm, as per the plans, the vegetation would be low level (under 600mm) and will not have an impact on pedestrian visibility. The totem sign would not impact pedestrian visibility as demonstrated on Figure 1.

Figure 1
Pedestrian Visibility Splay



The LHA has suggested 4 no. methods of mitigation, none of which are considered necessary given that there is no visibility issue.

Access Arrangements

The LHA has stated that the existing forecourt crossovers, with no proposed alterations, is unacceptable as it relies on outdated standards.

The LHA is advised that the proposed development is not a change of use or a development that will result in a material increase in pedestrian or traffic movements. Whilst the LHA may have a desire for the crossovers to be improved, respectfully, there is no policy requirement for this based on the nil detriment impact of the proposed development.

The LHA has made the comment,

With new builds, the planning process seeks/provides the opportunity to improve conditions for both development and highway safety by applying current higher standards of design, build and safety to new developments, and not to retain and/or continue with past obsolete standards, therefore improvement on the existing is not acceptable.

It is agreed that the opportunity exists to upgrade the crossovers but there is no obligation on the applicant to do so in order to secure planning permission. The LHA has not referred to any policy that places an obligation on the applicant to undertake highway improvements based on the proposed impact. Furthermore, the transport statement under sub-section 4.7 has demonstrated that there is no existing safety issue that requires improvement. Whilst the crossovers may not meet the standards of the LHA, based on the nil impact of the development and the historic accident records, there is no obligation for the applicant to undertake highway improvements.

Policies

The LHA has quoted three policy documents.

1. National Planning Policy Framework (NPPF), February 2025 - requires safe and suitable access and allow refusal where highway safety is compromised.

The LHA has not referenced any paragraph of the NPPF which allows such a refusal. However, the access is existing and without any history of accidents and the proposed modernisation of the PFS will not result in a net increase in traffic or person trip generation. Highway safety is therefore not compromised.

The NPPF at paragraph 116 states,

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

The supporting transport statement has demonstrated that the proposed modernisation of the PFS would not have a material impact on highway safety and there would be no severe cumulative impact.

2. Manual for Streets - Emphasising visibility, pedestrian priority, and safe access design.

Whilst the MfS is a useful design guide, it is not policy. Given that the site is an existing PFS with no proposed off-site works, MfS application is limited. The proposed development would not impact pedestrian priority or impact the safety of the existing access.

Local Transport Policy 4 - Hertfordshire's Local Transport Policy 4 (LTP4) is the county council's strategy for sustainable transport, focusing on enhancing bus services, improving safety, and promoting sustainable travel options.

The proposed development is demonstrated to have no impact on highway safety.

With regards to the LHA's comment that, new developments should improve upon existing conditions by applying current standards and that retaining obsolete layouts and access arrangements is not acceptable, there is no policy that places an obligation on the applicant to make highway improvements if the development would not have a material impact on highway safety.

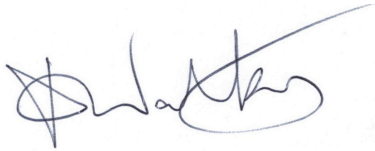
Conclusion

It is considered that all of the issues raised in LHA consultation response have been addressed or responded to appropriately. Highway improvements for the proposed development are not a mandatory requirement of any planning or transport policy, there are no unresolved risks to highway safety and all policies are demonstrated to be complied with.

It is therefore respectfully requested that the highway objection be removed.

Yours sincerely,

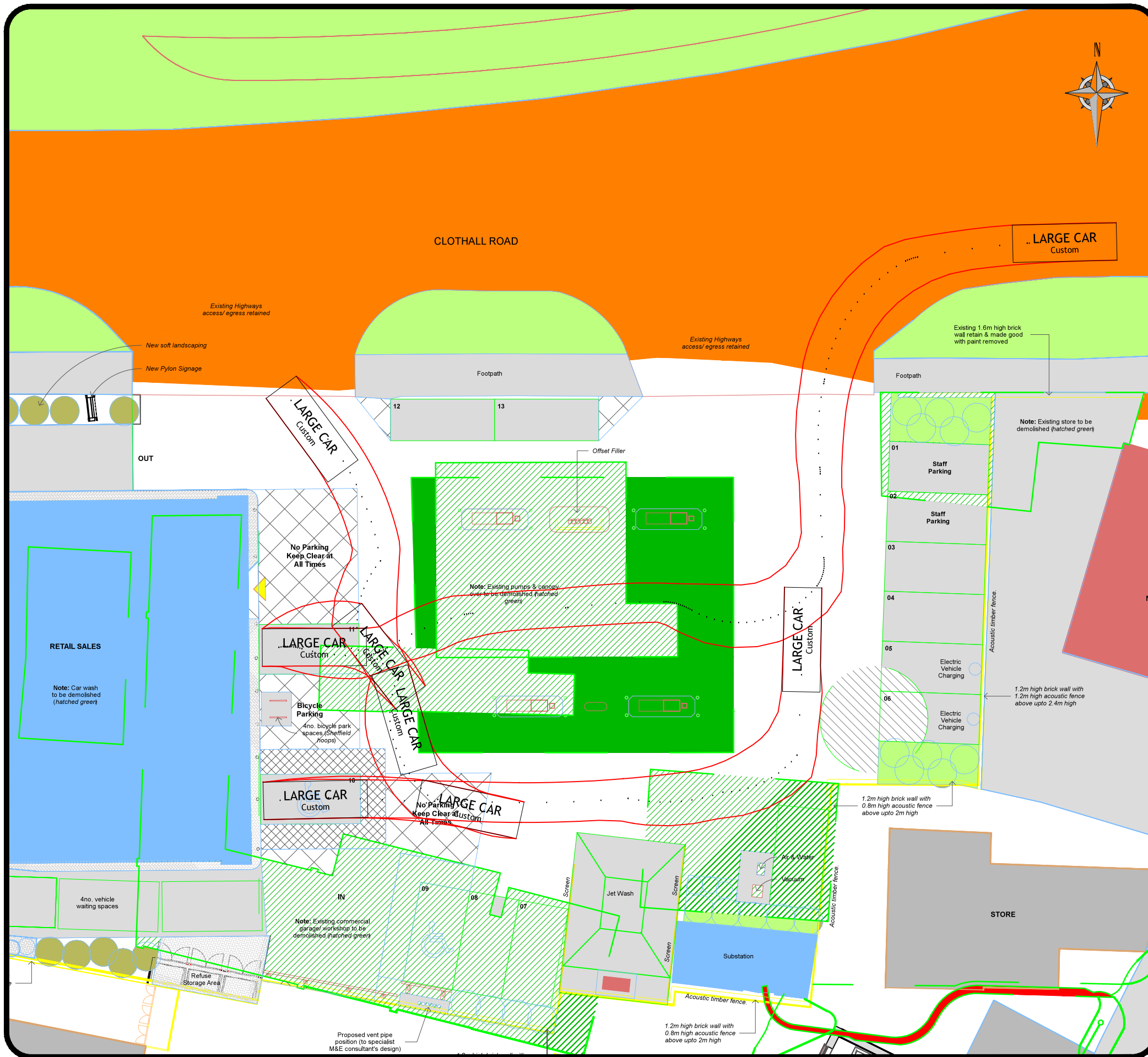
Dean Watkins IEng, MCIHT

A handwritten signature in blue ink, appearing to read 'Dean Watkins', with a long horizontal stroke extending to the right.

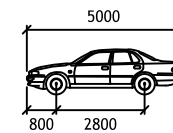
Managing Director

DW Transportation Limited

Encl. Drawings TS02-TS04



Notes



LARGE CAR mm
Width : 1800
Track : 1800
Lock to Lock Time : 6.0
Steering Angle : 36.0

No.	Revision/Issue	Date
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Client

Baldock Operations Limited



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Project

WHITEHORSE SERVICE STATION
CLOTHALL ROAD
BALDOCK

Drawing

LARGE CAR TRACKING

Project No

DWT368

Date

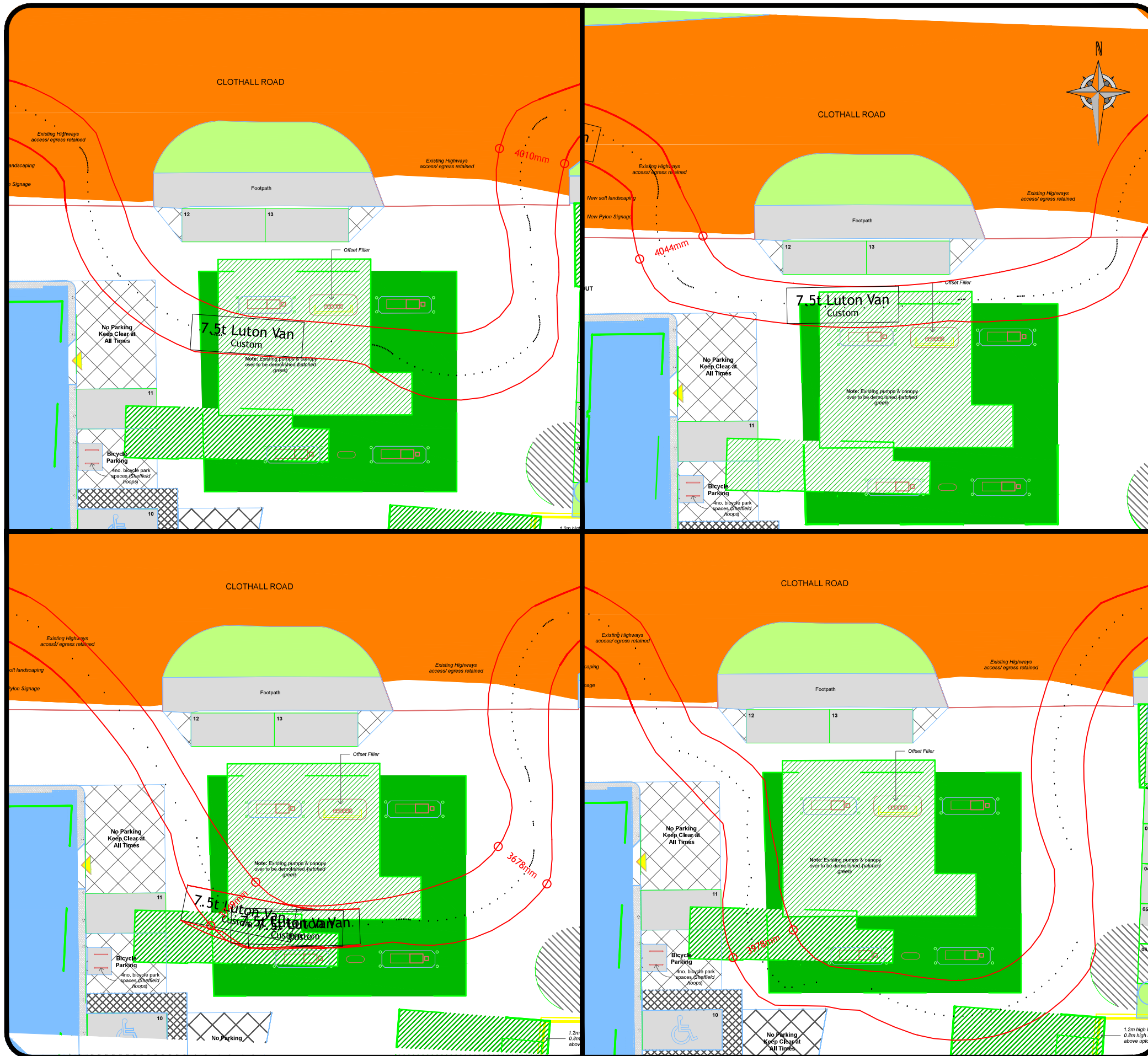
24.11.2025

Scale

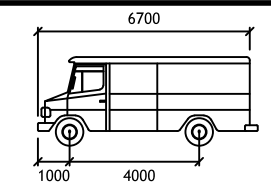
1:200@A3

Drawing No.

TS03



Notes



7.5t Luton Van mm
Width : 2140
Track : 2500
Lock to Lock Time : 6.0
Steering Angle : 40.0

No.	Revision/Issue	Date
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Project

WHITEHORSE SERVICE STATION
CLOTHALL ROAD
BALDOCK

Drawing

SITE LOCATION PLAN

Project No

DWT386

Date

17.03.2025

Scale

1:250@A3

Drawing No.

TS04